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March 13, 2003

**Ex Parte Presentation**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

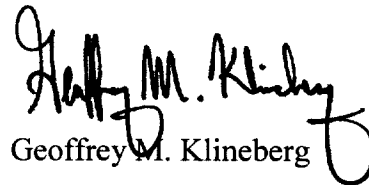
Re: *Application by SBC Communications Inc., et al. for Provision of In-Region,  
InterLATA Services in Michigan*, WC Docket No. 03-16

Dear Ms. Dortch:

On behalf of SBC Communications Inc., I am attaching a copy of a filing that Michigan Bell made today with the Michigan Public Service Commission ("Michigan PSC"). The filing consists of the revised compliance and improvement plans, reflecting modifications to the draft plans that Michigan Bell submitted on February 13. The modifications are the result of input received from and collaborative meetings with the staff of the Michigan PSC and the CLEC community.

In accordance with this Commission's Public Notice, DA 03-156 (Jan. 16, 2003), SBC is filing this letter and attachment electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,



Geoffrey M. Klineberg

**Attachment**

cc:	John P. Stanley	Dorothy Wideman
	Gina Spade	Ann R. Schneidewind
	Susan Pié	Qualex International
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March 13, 2003

**Via First Class Mail**

Dorothy Wideman  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, MI 48909

**Re: In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.  
Case No. U-12320**

Dear Ms. Wideman:

Please find enclosed for filing the original and 4 copies of *SBC's Modified Compliance and Improvement Plan Proposals* and *Proof of Service*.

If you should have any questions, please contact me. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Champion III". The signature is stylized with a large, sweeping "W" and a prominent "M" at the end.

William J. Champion III

WJC/mds  
Enclosures  
cc: Parties of Record, w/encl.

C o u n s e l l o r s   A t   L a w

DETROIT   BLOOMFIELD HILLS   LANSING   GRAND RAPIDS   ANN ARBOR  
WASHINGTON, D.C.

**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
_____	)	

**SBC'S MODIFIED COMPLIANCE AND IMPROVEMENT PLAN PROPOSALS**

On January 13, 2003, the Commission entered an Opinion and Order ("January 13 Order") in this proceeding in which it noted that "there are aspects of SBC's current performance that could be improved, and SBC has proposed to make improvements in some areas."<sup>1</sup> The January 13 Order provided specific direction to SBC regarding each of these proposed areas of improvement and ordered that: (a) SBC file revised draft compliance and improvement plans on or before February 13, 2003; (b) additional industry collaborative meetings to discuss these revised plans be held on March 4-5,2003; and (c) SBC file modified plans by March 13, 2003, that reflect the collaborative discussions.<sup>2</sup>.

In compliance with the January 13 Order, SBC hereby submits modified compliance plan proposals with respect to customer service record (CSR), directory listing database, and repair closure coding accuracy.<sup>3</sup> In addition, SBC hereby submits modified improvement plan

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<sup>1</sup> *Id.*, at 1.

<sup>2</sup> *Id.*, at 13.

<sup>3</sup> These compliance plans are attached hereto as Attachments A, B and C, respectively.

proposals with respect to line loss notifiers communications, pre-order timeliness, change management communications, and billing auditability and dispute resolution<sup>4</sup>

These modified compliance and improvement plan proposals respond to the Commission's directives in the January 13 Order, and reasonably reflect the proposed recommendations provided during the industry collaborative process. Accordingly, SBC requests that the Commission approve these plans.

**I. THE MODIFIED PLANS REFLECT PRODUCTIVE AND SUCCESSFUL INDUSTRY COLLABORATION AND FULLY RESPOND TO THE JANUARY 13 ORDER.**

The proposed compliance and improvement plans submitted herewith reflect significant revisions to the initial plans filed by SBC in this matter on October 30, 2002. In compliance with the January 13 Order, on February 13, 2003, SBC submitted revised draft compliance and improvement plans.<sup>5</sup> On March 4 – 5, 2003, SBC engaged in collaborative discussions with Staff and interested parties at the Commission's offices. As a result of questions and input received prior to and during those collaborative discussions, on March 10, 2003, SBC submitted revised versions of its February 13 proposals to Staff and interested parties. On March 12, 2003, SBC, Staff and interested parties engaged in further discussions regarding SBC's compliance and improvement plan proposals via conference call. As a result of input received from Staff and interested parties during the conference call, SBC again revised its proposed compliance and

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<sup>4</sup> These proposed improvement plans are attached hereto as Attachments D, E, F and G, respectively.

<sup>5</sup> Attached to SBC's February 13, 2003 filing as Attachment A – G.

improvement plans to both clarify agreements reached in the collaborative discussions, and to modify, where appropriate, the plans to account for concerns or suggestions made by Staff and interested parties.

The Revised Compliance and Improvement Plans submitted herewith reflect significant effort on the part of SBC, Staff and interested parties both to meet the objectives outlined by the Commission in its January 13 Order, and to accommodate concerns of all parties. Implementation of the modified plans will result in tangible improvement of those areas that were the subject of the January 13 Order. To facilitate the Commission's review of these modified plans, SBC has also provided for each a "redline" version that compares the modified plans submitted today with the February 13, 2003 proposals.<sup>6</sup>

## **II. THE LIKELY CONCERNS OF THE CLECS ARE MISPLACED**

Timing is everything. Although SBC believes that collaborative process and discussions were successful, the reality is that the CLECs have turned this opportunity to enhance the competitive landscape in Michigan, into an occasion to impede and delay the competitive benefits of SBC's pending Section 271 application at the FCC. In doing so, SBC expects that they will likely request the Commission to reject these modified proposals on three grounds. First, SBC assumes certain CLECs will argue here, as they are alleging at the FCC, that these plans are "...tacit admissions of current non-compliance..." or "promises of future

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<sup>6</sup> The redline plans are attached as Attachments A(RL) – H(RL). They were created using the "compare" functionality of Microsoft Word, and should be reasonably accurate, although certain formatting changes may not be captured.

performance.”<sup>7</sup> Second, although SBC incorporated significant industry input in the modified plans, SBC expects that certain CLECs will complain that they are inadequate in scope and approach. Finally, certain CLECs will demand that each of the four improvement plans be subject to third-party verification, and that all seven plans be transformed in a carbon-copy of the BearingPoint Michigan Master Test Plan. None of these likely concerns is valid.

**A. These Modified Plans are Not Required to Demonstrate Current Compliance with the Competitive Checklist.**

SBC has demonstrated, and the Commission has found, that it is in current compliance with each of Section 271 competitive checklist items, including each of the areas addressed in the attached modified compliance and improvement plans. These proposals are submitted to improve and enhance SBC’ current performance; they are not needed to satisfy the legal requirements of Section 271. The CLECs’ confusion on this point is curious since the Commission has been consistently clear on the nature and purpose of these compliance and improvement plans, and the fact that they are not needed or required to demonstrate checklist compliance. In its January 13, 2003 Report, this Commission concluded:

After consideration of all the information incorporated into this and other related proceedings, the Commission now concludes that SBC has complied with Section 271(c) of the FTA and the rules and regulations promulgated by the FCC.<sup>8</sup>

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<sup>7</sup> See e.g., Reply Comments of AT&T, dated March 4, 2003, filed in Application of SBC Communications, for Provision of In-Region InterLATA Services in Michigan, WC Docket No. 03-16, at p.8

<sup>8</sup> See *Report of the Michigan Public Service Commission*, dated January 13, 2003, at p. 3.

Likewise in its January 13 Opinion and Order, this Commission concluded:

As described more fully in the report, the Commission finds that SBC has demonstrated compliance with Section 271. Notwithstanding that conclusion, there are aspects of SBC's current performance that could be improved, and SBC has proposed to make improvements in some areas.<sup>9</sup>

More recently, in its Reply Comments filed in WC Docket No. 03-16, this Commission again concluded:

The Commission has required the submittal by SBC of improvement plans to address those issues where it is believed further improvements can be achieved (but which do not rise to the level of Section 271 non-compliance). SBC submitted compliance and improvement proposals on February 13, 2003,<sup>10</sup> which will be the subject of collaborative discussions on March 4<sup>th</sup> and 5<sup>th</sup> in the Lansing, Michigan Commission offices. A number of CLECs have indicated their intention to participate in these discussions along with representatives of BearingPoint, SBC, and the Commission Staff. As a result of the collaborative discussions, SBC is then required to submit modified plans to this Commission by March 13, 2003. Should further action be required, the Commission will issue additional orders on this matter.<sup>11</sup>

Targeted improvement plans for specific areas are not, and should not be construed, as AT&T has done, as "...tacit admissions of current non-compliance...." Rather, they are concrete examples of SBC's willingness to continue to work collaboratively with the industry to address CLEC requests for improvements to its OSS interfaces, processes and procedures, and of the on-going oversight and review by this Commission to ensure that the highly competitive local market in Michigan continues to thrive.

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<sup>9</sup> See January 13 Order at p. 1.

<sup>10</sup> SBC filed a copy of this submission with the FCC in the subject proceeding on February 19, 2003.

<sup>11</sup> Reply Comments of the Michigan Public Service Commission, dated March 4, 2003, filed in Application of SBC Communications, for Provision of In-Region InterLATA Services in Michigan, WC Docket No. 03-16, at p. 4.

Moreover, these modified proposals are not “future promises.” The Michigan Commission has *required* SBC to submit modified plans in response to the January 13 Order. If no further orders are issued on this matter, that the January 13 Order *requires* SBC to implement the terms of these modified plans. And, of course, if the Commission issues further orders in this matter, such orders, like any other Commission order, will create binding legal obligations and requirements upon SBC. In sum, these plans do not constitute “future promises”; once adopted, they will be concrete and specific legal obligations that SBC will be legally required to follow.

#### **B. The Plans are Adequate in Scope and Approach.**

During the March 4, 5 and 12, 2003 collaborative discussions SBC made significant modifications in response to virtually all of the CLECs recommendations. These changes are documented by the redline comparison between the February 13 proposals and the March 13 plans. Although some of the CLECs filed detailed comments at the FCC attacking the *February 13, 2003* drafts, SBC is not aware of any specific or material alternative proposals for any plan submitted in response to the March 10, 2003, post-collaborative draft, nor were there any significant or material modifications suggested on the March 12, 2003 call that were not adopted by SBC.

However, during the collaborative discussions the CLECs raised a generic concern regarding the scope and approach of each of the three compliance plans. SBC believes the CLECs’ request to expand the scope of the plans or the testing methodology should be rejected. Basically, the CLECs took issue with the scope of the root cause analysis in each of the compliance plans. During the collaborative meetings SBC explained that the root cause analysis was driven by BearingPoint’s OSS final testing results. SBC did not include in its compliance



plans any root cause analysis or action corrective actions for those areas in which SBC had “satisfied” BearingPoint test criteria in the area covered by the plan. Rather, and more appropriately, the root cause analysis and the corrective actions in the compliance plans are focused on those test criteria that were found to be “not satisfied.”

The third party examination includes a process evaluation of the actions taken and a review of actual commercial transaction results. During the collaborative meeting the CLECs did not appear to have any concerns with the selection of BearingPoint, or the process evaluation. However, certain CLECs challenged the scope of BearingPoint’s review of actual commercial transactions. In contrast to the targeted focus that was used for root cause analysis and corrective actions, SBC is proposing that BearingPoint conduct a statistically valid nonbiased sample from commercial production in the SBC Midwest region. SBC disagrees with the recommendation of certain CLECs that the BearingPoint sample should be biased on and limited to orders associated with the root cause and actions. Moreover, using a narrow, biased sample would not result in an “apples-to-apples” comparison to either BearingPoint’s prior transaction testing or applicable Michigan performance measures. SBC’s approach is reasonable, and should be adopted.

**C. The Plans are Appropriate and Provide CLECs with Sufficient Information Regarding Continuing Progress.**

SBC has engaged BearingPoint to conduct an independent, third party review of SBC’s implementation, and the results of the actions taken, for each of the three compliance plans. However, subject to any further direction from the Commission, SBC does not propose to engage a third-party contractor in connection with any of these four improvement plans. These

improvement plans, for the most part, simply provide the Commission and CLECs with additional information with respect to on-going activity, improve communications, or will involve further industry input in existing industry forums. Accordingly, SBC believes third-party review of the improvement plans is unnecessary.

Moreover, given the narrow scope of these plans, and that fact that the OSS operational test (TVV and PPR) has been virtually concluded, it is unnecessary to re-create the observation and exceptions process. This is consistent with the January 13 Order which provided:

Any outstanding exceptions and observations open as of the date of this order in BearingPoint's transactions and procedures tests shall continue to be addressed by SBC until satisfactory results have been achieved as determined by BearingPoint, or are closed as determined by the Commission and its Staff. No further new or refresh processes and procedures tests or transaction verification and validation tests not specifically addressed below shall be undertaken by BearingPoint in Michigan pursuant to the Michigan Master Test Plan.

None of the areas covered by these modified plans are open observations or exceptions. Accordingly, it is not appropriate to include these areas within the BearingPoint Master Test Plan. SBC has already responded to a similar claim made by WorldCom and incorporates those comments by reference.<sup>12</sup> However, SBC acknowledged that the CLECs have an interest in the on-going status and progress for both the compliance and improvement plans. In that regard SBC has modified each of the plans to supplement the information filed with the Commission, and on the interested parties to this proceeding.

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<sup>12</sup> See SBC's Response filed on February 28, 2003 to WorldCom's second Petition for Rehearing of the Commissions January 13 Order at 5-7.

### III. CONCLUSION

The attached modified compliance and improvement plan proposals respond to the Commission's directives in the January 13 Order, and reasonably reflect the proposed recommendations provided during the industry collaborative process. Accordingly, SBC respectfully requests that these plans be approved.

Respectfully submitted,

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Dated: March 13, 2003

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

STATE OF MICHIGAN )  
 ) ss.  
COUNTY OF INGHAM )

  
Mindy D. Smith

*Alicia M. Ball*  
Alicia M. Ball, Notary Public  
Ingham County, Michigan  
My Commission Expires: 01/07/06

**SERVICE LIST – MPSC CASE NO. U-12320**

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**MPSC Case No. U-12320**

**Customer Service Inquiry Accuracy Plan**

**March 13, 2003**



# CSI Accuracy Plan

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### 1. Purpose

The purpose of this plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of Customer Service Inquiry (“CSI”) accuracy. SBC originally proposed a CSI plan on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with CSI accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC’s implementation of this plan.

### 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 33 as part of the Third Party Operations Support Systems (“OSS”) testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry (“CSI”) records. In this test, information contained within the Customer Service Record (“CSR”) extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested CSI accuracy three times over a nine-month period. On October 24, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 14, 2002. BearingPoint’s October 30, 2002 Michigan OSS Evaluation Project Report at p. 934 found that test criteria for TVV4-27 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from 88% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

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<sup>1</sup> MPSC Report, January 13, 2003, pg. 67 – “[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete.”

### 3. Root Cause Analysis

The process for updating a customer service record begins when a CLEC submits a local service request through the EDI or GUI interfaces, or via fax, to migrate, install, convert, change or disconnect network elements or services. These LSRs are further processed by SBC's internal Local Service Center ("LSC") systems or service representatives, where service orders internal to SBC are created. These service orders travel further to downstream processing systems. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System ("ACIS"). A CLEC may obtain access to a CSR by issuing a customer service inquiry using the Verigate, EDI or CORBA interfaces.

As noted above, BearingPoint conducted three separate CSI accuracy tests over a nine-month period. In keeping with the "military style" nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two CSI accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC's root cause analysis will focus on the remaining failure points of the third test.<sup>2</sup> However, as noted below, BearingPoint will conduct an evaluation based on sampling of commercial production orders that include a diverse set of product types and not limited to UNE-P and resale orders.

The results of the third CSI accuracy test, as reported by BearingPoint, show Resale and UNE-P orders failing to accurately update the post-completion CSR. In its analysis of these results, SBC determined that the primary cause of CSI inaccuracies was errors on manual handling. In these situations, the data on the CLEC-submitted LSR was not accurately input on the internal service order by the SBC service representative. Any inaccuracy on the service order is then reflected in the ACIS CSR database when the database is updated upon order completion.

These manually-handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and, thus, are not addressed in SBC's root cause analysis or action steps.<sup>3</sup> In response to comments raised in the collaborative, SBC again reviewed the latest version of the BearingPoint test results and confirmed that the only two products that were failing were resale and UNE-P. Furthermore, BearingPoint also successfully tested the EDI and GUI

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<sup>2</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint's benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.

<sup>3</sup> AT&T questioned why more products were not included in this plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.

## CSI Accuracy Plan

interfaces, as well as the faxed order mechanism, that deliver the LSR information to the Mechanized Order Receipt (“MOR”) and Local Access Service Request (“LASR”) applications that store this information prior to further processing; therefore the translation of LSR information from these input sources also does not need to be addressed in this plan.<sup>4</sup>

It is also important to note that a failure in the CSR update process does not imply a failure in provisioning processes or systems. While some failures in the CSI accuracy test resulted in switch features not being updated according to the LSR, the failures were due to manual order process failures, not provisioning process failures. In fact, BearingPoint determined in its evaluation of test criteria TVV4-2 and TVV4-24 that SBC provisioned and disconnected switch features accurately in Michigan.

### 4. Actions

The plan for CSI Accuracy proposed by SBC in its October 30 Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, the commitment by SBC to fix errors identified as part of its quality review, the scope of testing beyond UNE-P and resale<sup>5</sup>, and the potential need for a performance measure of CSI Accuracy.<sup>6</sup> SBC has addressed the

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<sup>4</sup> BearingPoint test criterion TVV1-4, which states “SBC Ameritech provides required order functionality,” was reported as “not satisfied” in BearingPoint’s October 30, 2002 report; however, none of the observations cited in the report for that test criterion were related to LSR translation, and in any case have since been closed successfully.

<sup>5</sup> As revised, the scope of BearingPoint’s analysis of commercial production includes a diverse set of products, and is not limited to UNE-P and resale. This will help determine if additional reasons for errors, beyond those covered in the actions steps in this plan, require further or additional root cause analysis.

<sup>6</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 23, ¶ 51. SBC does not believe that a separate performance measure is necessary. Performance measure changes are discussed in the performance measure six-month review; one of which has just concluded.

## **CSI Accuracy Plan**

requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

### **1. Service Representative Training**

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package<sup>7</sup> directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information on the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region.

- Starting in January 2003<sup>8</sup>, service representatives are receiving training using the Service Order Quality informational package.
  - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
  - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
  - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

### **2. CSI Quality Review**

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<sup>7</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

<sup>8</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this plan to address specific timeframes for each action item, including component items of each action item.

## CSI Accuracy Plan

- SBC is designing an internal quality review process for CSI accuracy<sup>9</sup>. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling (“manual-manual” and “auto-manual”) to monitor CSI accuracy. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders; while SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: Monitoring the effectiveness of its training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month.

These quality reviews will be conducted on an ongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and process type. Sampled orders will come from auto-manual and manual-manual orders.
- Quality Assurance (“QA”) service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
  - Verify that discrepancies are in fact errors;
  - Correct identified errors;
  - Identify root causes of errors;
  - Provide the basis for individual coaching of service representatives.
- The QA service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

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<sup>9</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

## CSI Accuracy Plan

### **3. Corrective Actions**

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:<sup>10</sup>
  - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
  - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
  - This information will be used to determine whether individual service representative coaching is needed, and/or additional training, changes to processes, methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
Quality Assurance-Related Tasks			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress

<sup>10</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will address accuracy improvement and maintenance. SBC has expanded the detail provided in this plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

## CSI Accuracy Plan

Task	Begin	End	Status
2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform (“UNE-P”) and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE -P orders	02/03/03	Ongoing	In progress
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC’s implementations of the actions described in the “Actions” section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint’s project plan.
- The third party will report the accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a nonbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint’s project plan. The accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint’s test results of 92% accurate. SBC’s internal target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC.



### **CSI Accuracy Plan**

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.



**MPSC Case No. U-12320**

**~~Draft Compliance Plan~~**

**~~For~~**

**Customer Service Inquiry Accuracy Plan**

**~~February 13, 2003~~**

**March 13, 2003**

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## 1. Purpose

The purpose of this ~~revised draft compliance~~ plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of Customer Service Inquiry (“CSI”) accuracy. SBC originally proposed a CSI ~~compliance~~ plan on October 30, 2002 (“October 30 ~~Compliance~~ Filing”). ~~As directed by~~ Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”), in Case No. ~~U-12320, this draft has been revised to further address~~ U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with CSI accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC ~~recognizes that further modifications to this plan may be appropriate based on~~ further modified this plan based on input received during the collaborative session ~~scheduled for March 4–5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends~~ held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a ~~to retain~~ conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC’s implementation of ~~the final compliance~~ this plan.

## 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 33 as part of the Third Party Operations Support Systems (“OSS”) testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry (“CSI”) records. In this test, information contained within the ~~CSR~~ Customer Service Record (“CSR”) extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested CSI accuracy three times over a nine-month period. On October 24, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 14, 2002. BearingPoint’s October 30, 2002 Michigan OSS Test Evaluation Project Report at p. 934 found that test criteria for TVV4-27 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from 88% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are

<sup>1</sup> MPSC Report, January 13, 2003, pg. 67 – “[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete.”

associated with product ordering scenarios not widely seen in the commercial environment.

### 3. Root Cause Analysis

The process for updating a customer service record (“CSR”) begins when a CLEC submits a local service request (“LSR”) through the EDI or GUI interfaces, or via fax, to migrate, install, convert, change or disconnect network elements or services. These LSRs are further processed by SBC’s internal Local Service Center (“LSC”) systems or service representatives, where service orders internal to SBC are created. These service orders travel further to downstream processing systems. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System (“ACIS”). A CLEC may obtain access to a CSR by issuing a customer service inquiry (“CSI”) using the Verigate, EDI or CORBA interfaces.

~~In its analysis of the results provided by the~~As noted above, BearingPoint conducted three separate CSI accuracy tests over a nine-month period. In keeping with the “military style” nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two CSI accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC’s root cause analysis will focus on the remaining failure points of the third test.<sup>2</sup> However, as noted below, BearingPoint will conduct an evaluation based on sampling of commercial production orders that include a diverse set of product types and not limited to UNE-P and resale orders.

The results of the third CSI accuracy test, as reported by BearingPoint, show Resale and UNE-P orders failing to accurately update the post-completion CSR. In its analysis of these results, SBC determined that the primary cause of CSI inaccuracies was errors on manually handled Resale and UNE-P service orders. ~~manual handling.~~ In these situations, the data on the ~~CLEC-CLEC~~ submitted LSR was not accurately input on the internal service order by the SBC service representative. Any inaccuracy on the service order is then reflected in the ACIS CSR database when the database is updated upon order completion.

These manually-handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and,

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<sup>2</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint’s benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.

## CSI Accuracy Plan

thus, are not addressed in SBC's root cause analysis or action steps. <sup>3</sup> In response to comments raised in the collaborative, SBC again reviewed the latest version of the BearingPoint test results and confirmed that the only two products that were failing were resale and UNE-P. Furthermore, BearingPoint also successfully tested the EDI and GUI interfaces, as well as the faxed order mechanism, that deliver the LSR information to the Mechanized Order Receipt ("MOR") and Local ~~de~~Access Service Request ("LASR") applications that store this information prior to further processing; therefore the translation of LSR information from these input sources also does not need to be addressed in this ~~compliance plan.~~<sup>4</sup> plan.<sup>5</sup>

It is also important to note that a failure in the CSR update process does not imply a failure in provisioning processes or systems. While some failures in the CSI accuracy test resulted in switch features not being updated according to the LSR, the failures were due to manual order process failures, not provisioning process failures. In fact, BearingPoint determined in its evaluation of test criteria TVV4-2 and TVV4-24 that SBC provisioned and disconnected switch features accurately in Michigan.

## **4. Actions**

The ~~compliance~~ plan for CSI Accuracy proposed by SBC in its October 30 ~~Compliance~~ Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy ~~compliance~~ plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy ~~compliance~~ plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, ~~athe~~ commitment by SBC to fix errors identified as part of its quality review, the scope of testing beyond UNE-P and

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<sup>3</sup> AT&T questioned why more products were not included in this plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.

<sup>4</sup> ~~AT&T questioned why more products were not included in this compliance plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.~~

<sup>5</sup> BearingPoint test criterion TVV1-4, which states "SBC Ameritech provides required order functionality," was reported as "not satisfied" in BearingPoint's October 30, 2002 report; however, none of the observations cited in the report for that test criterion were related to LSR translation, and in any case have since been closed successfully.

## CSI Accuracy Plan

[resale](#)<sup>6</sup>, and the potential need for a performance measure of CSI Accuracy.<sup>7</sup> SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

### **1. Service Representative Training**

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package<sup>8</sup> directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information ~~such as SBC management's commitment to quality order processing, on~~ the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, ~~2002~~.

[2002, and applies across the entire SBC Midwest region.](#)

- Starting in January 2003<sup>9</sup>, service representatives ~~will receive~~[are receiving](#) training using the Service Order Quality informational package.
  - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
  - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.

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<sup>6</sup> [As revised, the scope of BearingPoint's analysis of commercial production includes a diverse set of products, and is not limited to UNE-P and resale. This will help determine if additional reasons for errors, beyond those covered in the actions steps in this plan, require further or additional root cause analysis.](#)

<sup>7</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 23, ¶ 51. SBC does not believe that a separate performance measure is necessary. Performance measure changes are ~~generally~~ discussed in the performance measure six-month review; one of which ~~is just concluding~~[has just concluded](#).

<sup>8</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this ~~compliance~~ plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

<sup>9</sup> ~~See~~ AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this ~~compliance~~ plan to address specific timeframes for each action item, including component items of each action item.

## CSI Accuracy Plan

- A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

### **2. CSI Quality Review**

- SBC is designing an internal quality review process for CSI accuracy<sup>10</sup>. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor CSI accuracy. The intent of the sampling activity is to assist in identifying potential problem accuracy<sup>11</sup>. This mechanism will enable SBC to monitor areas in the manual processing of these orders; while SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: Monitoring the effectiveness of its training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month.

These quality reviews will be conducted on a frequent, on-going an ongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which (DSS). DSS is a reporting system used by the LSC to track and capture information on order activity.
- activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and status-process type. Sampled orders will come from pending orders, i.e., orders not yet completed-auto-manual and manual-manual orders.

<sup>10</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this compliance plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

<sup>11</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE P and Resale product types did not meet BearingPoint's benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.



## CSI Accuracy Plan

- Quality Assurance (“QA”) service representatives, experienced service representatives selected for this purpose, will conduct reviews using ~~Methods and Procedures~~methods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
  - Verify that discrepancies are in fact errors;
  - Correct identified errors;
  - Identify root causes of errors;
  - Provide the basis for individual coaching of service representatives.
- The QA service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as ~~necessary prior to order completion.~~necessary.

### 3. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:<sup>12</sup>
  - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
  - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
  - This information will be used to determine whether individual service representative coaching is needed, ~~or if~~and/or additional training, changes to processes, methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

<sup>12</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will ~~assure that accuracy improves and will be maintained.~~address accuracy improvement and maintenance. SBC has expanded the detail provided in this ~~compliance~~ plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

## CSI Accuracy Plan

Task	Begin	End	Status
Quality Assurance-Related Tasks			
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A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress
<del>2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform ("UNE-P") and Resale orders.</del>	<del>12/15/02</del>	<del>Ongoing</del>	<del>In progress</del>
<u>2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.</u>	<u>12/15/02</u>	<u>Ongoing</u>	<u>In progress</u>
A. Design quality review process	12/15/02	1/31/03	Complete
<del>B. Implement daily quality review of Resale and UNE-P Complex orders</del>	<del>02/03/03</del>	<del>Ongoing</del>	<del>In progress</del>
<u>B. Implement daily quality review of Resale and UNE-P orders</u>	<u>02/03/03</u>	<u>Ongoing</u>	<u>In progress</u>
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will

## CSI Accuracy Plan

include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.

- The third party will report the accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a nonbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this ~~Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the~~ transaction analysis will be reviewed with SBC and with the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint's test results of 92% accurate. SBC's internal target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:
- ~~The third party will review accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and with the MPSC staff prior to its implementation.~~
- ? ~~The third party will evaluate SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results. SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.~~



**MPSC Case No. U-12320**

**Directory Listings &  
Directory Assistance Database  
Update Accuracy Plan**

**March 13, 2003**

**DL/DA Update Accuracy Plan**

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## **1. Purpose**

The purpose of this plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of directory listings and directory assistance database (“DL/DA”) accuracy. SBC originally proposed a DL/DA plan on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with DL/DA accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC’s implementation of this plan.

## **2. Issue Definition**

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 52 as part of the Third Party Operations Support Systems (“OSS”) testing on March 21, 2002 stating that they have observed instances of incorrect updates to SBC’s directory assistance database. In this test, information contained within the directory listings and directory assistance database were evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested DL/DA accuracy three times over a six-month period. On November 11, 2002, SBC requested that no further re-testing be performed, and a final disposition report was issued on November 18, 2002. BearingPoint’s October 30, 2002 Michigan OSS Evaluation Project Report at p. 917 found that test criteria for TVV4-1 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from 42.9% to 91.2%; the MPSC found the difference between 91.2% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

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<sup>1</sup> MPSC Report, January 13, 2003, pg. 67 – “[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete.”

### **3. Root Cause Analysis**

The process for updating the directory assistance database begins when a CLEC submits a local service request (“LSR”) or a stand-alone directory service request (“DSR”) that requests an update to directory listing (“DL”) names, addresses or telephone numbers. (A Local Number Portability – Only (“LNP-only”)) request requires the CLEC to submit a separate DL service request.). During the process, a directory listing is modified based on the information provided by the CLEC in the LSR or DSR.

As noted above, BearingPoint conducted three separate DL/DA accuracy tests over a six-month period. In keeping with the “military style” nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two DL update accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC’s root cause analysis focuses on the remaining failure points of the third test.

The results of the third DL update accuracy test, as reported by BearingPoint, show orders failing to accurately update the Directory Assistance Database. In its analysis of these results, SBC determined that the primary cause of DL/DA update inaccuracies was intermittent errors on manually handled orders and generally associated with complex listings<sup>2</sup>. In other words, the majority of the identified errors were caused by service representatives handling complex listings.

### **4. Actions**

The plan for DL/DA update accuracy proposed by SBC in its October 30 Filing was constructed to address the reliability and accuracy of manual service orders. The plan included systems modifications, manual process updates, and the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the DL/DA update accuracy plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the DL/DA update accuracy plan, AT&T made reference to: how the system enhancements address the issues at hand; when and where the issues at hand originated; the purpose of the manual work-around and how it is different from current

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<sup>2</sup> An example of a Complex listing is a caption listing that has one or more indented listings grouped (or captioned) beneath the main listed name. This is mainly used for hospitals, schools and government agencies.

## DL/DA Update Accuracy Plan

practices; the limited nature of the long-term mechanism as it applies to one error type; as well as, the same issues raised with the Customer Service Inquiry (“CSI”) Accuracy Plan (the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, the scope of testing<sup>3</sup>, and the potential need for a performance measure<sup>4</sup>). SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of DL/DA:

### 1. System and Process Enhancements

- SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt (“MOR”) files to the Advance Listing Products and Services System (“ALPSS”) in December 2002.<sup>5</sup>
  - This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the update.
  - This enhancement will ensure an improvement in timely receipt of mechanized order, as manual intervention will be minimized/eliminated.
- SBC implemented an interim manual work process in December 2002, to resolve ALPSS errors identified in the “Skipped Section Report”<sup>6</sup> within three business days.<sup>7</sup>
  - This new daily work process will ensure the minimization of “Skipped Section Report” backlogs and, in turn, will improve the timely handling of errors identified by ALPSS. As result, the DL/DA update accuracy will improve through better error handling.
- SBC will implement a long term mechanical process to route orders identified by the “Skipped Section Report” into the established ALPSS error handling process by March 1, 2003.<sup>8</sup>

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<sup>3</sup> However, as noted below, BearingPoint will conduct an evaluation based on sampling of actual commercial production orders that include a diverse set of product and listings types.

<sup>4</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 23, ¶¶ 57-61. SBC does not believe that a separate performance measure is necessary. Performance measure changes are discussed in the performance measure six-month review; one of which has just concluded.

<sup>5</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 25, ¶ 57. SBC has provided detail on the vendor updates and the issues that it addresses. This update address all non-UNE-P and non-resale order issues identified in the BearingPoint test since these other orders are transmitted directly to ALPSS from MOR.

<sup>6</sup> The “Skipped Section Report” is produced daily and contains service orders which could not be added to the APLSS system due to unanticipated error conditions (e.g. duplicate telephone number, corrupted data, etc). This report is used to investigate the root cause and the necessary corrective action to resolve these errors.

<sup>7</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 58. SBC has provided details explaining the issue being addressed by the interim manual process.



## **DL/DA Update Accuracy Plan**

- While not replacing the “Skipped Section Report” manual work process, this enhancement will further automate the ALPSS error handling and minimize manual processes by better identifying errors that would otherwise be handled manually.

### **2. Service Representative Training**

SBC developed for Local Service Center (“LSC”) service representatives a Service Order Quality informational package<sup>9</sup> directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during training to service representatives involved in producing SBC Customer Information System (“ACIS”) service orders. This package provides information such as the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region.

- Starting in January 2003<sup>10</sup>, service representatives will receive training using the Service Order Quality informational package.
  - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
  - Review of the package is accomplished in mandatory training sessions facilitated by SBC’s Training Department. Logs will be maintained to track attendance and manage attendance compliance.
  - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management’s commitment to service order accuracy.

### **3. DL/DA Quality Review**

- SBC is designing an internal quality review process for DL/DA accuracy<sup>11</sup>. This review will rely on sampling UNE-P and Resale production service orders that drop

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<sup>8</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 59. SBC has provided details explaining what the long term mechanism addresses.

<sup>9</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

<sup>10</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this plan to address specific timeframes for each action item, including component items of each action item.

<sup>11</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

## DL/DA Update Accuracy Plan

to manual handling (“manual-manual” and “auto-manual”) to monitor DL/DA accuracy<sup>12</sup>. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders. While SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: Monitoring the effectiveness of its training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month. These quality reviews will be conducted on an ongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (“DSS”). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and process type. Sampled orders will come from both manual-manual and auto-manual orders.
- Quality Assurance (“QA”) service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
  - Verify that discrepancies are in fact errors;
  - Correct identified errors on pending orders;
  - Identify root causes of errors;
  - Provide the basis for individual coaching of service representatives.
- The QA service representatives will compare the CLEC Local Service Request to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

### 4. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above<sup>13</sup> in the following manner:

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<sup>12</sup> See AT&T’s comments filed 11/15/02, Connelly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint’s benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to re-test all product types.

<sup>13</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will address accuracy improvement and maintenance. SBC has expanded the detail provided in this plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

## DL/DA Update Accuracy Plan

- Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
- Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
- This information will be used to determine whether individual service representative coaching is needed, or if additional training, and/or changes to processes, and/or methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including changes to processes, systems and/or additional training.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
<b>System-Related Tasks</b>			
1. Implement system changes to allow automated daily file transfers of MOR files to AAS/IT	10/28/02	12/31/02	Completed
A. Develop and test AAS/IT Interface software modification	10/28/02	11/01/02	Completed
B. Develop MOR Interface modification	10/28/02	11/01/02	Completed
C. Install MOR Interface modification	11/10/02	12/31/02	Completed
2. Implement interim manual work process for ALPSS errors identified in the "Skipped Section Report" within three business days	10/01/02	Ongoing	In progress
A. Review existing process to determine backlog avoidance	10/01/02	11/01/02	Completed
B. Implement interim manual work process	11/01/02	12/01/02	Completed
C. Managers report weekly backlog information (numbers, age, etc.)	12/01/02	Ongoing	In progress
D. Manager evaluates "Skipped Section Report" and takes action to ensure a backlog does not occur	12/01/02	Ongoing	In progress
3. Implement system changes to ALPSS error handling process to route listings identified by the "Skipped Section Report"	11/13/02	03/03/03	Completed
A. Receive ALPSS new software version from vendor	11/13/02	11/13/02	Completed
B. Perform testing	11/14/02	02/02/03	Completed
C. Installed in production	03/01/03	03/03/03	Completed
<b>Quality Assurance-Related Tasks</b>			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress

## DL/DA Update Accuracy Plan

Task	Begin	End	Status
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress
2. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE - P orders	02/03/03	Ongoing	In progress
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Completed
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in this plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.
- The third party will report the accuracy of DL/DA updates by comparing updates with local service requests using an unbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. This accuracy of DL/DA updates is expected to improve when compared to BearingPoint's test results of 91.2% accurate. SBC's target is 95% accuracy. If the third party evaluation does not

## **DL/DA Update Accuracy Plan**

show the target has been achieved, any further required action will be determined by the MPSC.

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the Commission by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.



**MPSC Case No. U-12320**

**~~Draft Compliance Plan~~**

**~~For~~**

**Directory Listings &**

**Directory Assistance Database**

**~~Update Accuracy~~**

**~~February 13, 2003~~ Update Accuracy Plan**



**March 13, 2003**

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## 1. Purpose

The purpose of this ~~revised draft compliance~~ plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of directory listings and directory assistance database (“DL/DA”) accuracy. SBC originally proposed a DL/DA ~~compliance~~ plan on October 30, 2002 (“October 30 ~~Compliance~~ Filing”). ~~As directed by Pursuant to~~ the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”), in Case No. ~~U-12320, this draft has been revised to further address~~ U-12320 (SBC’s §271 Checklist Compliance Docket), ~~the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed~~ the operational concerns with DL/DA accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC ~~recognizes that further modifications to this plan may be appropriate based on~~ further modified this plan based on input received during the collaborative session ~~scheduled for March 4–5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from~~ held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff ~~the MPSC, SBC intends to retain and collaborative participants on a conference call held on March 12, 2003. SBC has retained~~ BearingPoint to evaluate SBC’s implementation of ~~the final compliance~~ this plan.

## 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 52 as part of the Third Party Operations Support Systems (“OSS”) testing on March 21, 2002 stating that they have observed instances of incorrect updates to SBC’s directory assistance database. In this test, information contained within the directory listings and directory assistance database were evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested DL/DA accuracy three times over a six-month period. On November 11, 2002, SBC requested that no further re-testing be performed, and a final disposition report was issued on November 18, 2002. BearingPoint’s October 30, 2002 Michigan OSS Test Evaluation Project Report at p. 917 found that test criteria for TVV4-1 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from ~~57%~~ 42.9% to 91.2%; the MPSC found the difference between 91.2% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or

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provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

### 3. Root Cause Analysis

The process for updating the directory assistance database begins when a CLEC submits a local service request (“LSR”) or a stand-alone directory service request (“DSR”) that requests an update to directory listing (“DL”) names, addresses or telephone numbers. ~~(An LNP-only~~(A Local Number Portability – Only (“LNP-only”)) request requires the CLEC to submit a separate DL service request.) During the process, a directory listing is modified based on the information provided by the CLEC in the LSR or DSR.

~~In its analysis of the results provided by the~~As noted above, BearingPoint conducted three separate DL/DA accuracy tests over a six-month period. In keeping with the “military style” nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two DL update accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC’s root cause analysis focuses on the remaining failure points of the third test.

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### 4. Actions

The ~~compliance~~compliance plan for DL/DA update accuracy proposed by SBC in its October 30 ~~Compliance~~Compliance Filing was constructed to address the reliability and accuracy of manual service orders. The plan included systems modifications, manual process updates, and the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

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<sup>2</sup> An example of a Complex listing is a caption listing that has one or more indented listings grouped (or captioned) beneath the main listed name. This is mainly used for hospitals, schools and government agencies.

## **Draft DL/DA Update Accuracy Compliance Plan**

The MPSC in its January 13 Order indicated that the DL/DA update accuracy ~~compliance~~ plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the DL/DA ~~Update Accuracy Compliance Plan~~, update accuracy plan, AT&T made reference to: how the system enhancements address the issues at hand; when and where the ~~system enhancements are from~~ issues at hand originated; the purpose of the manual work-around and how it is different from current ~~practices~~ practices; the limited nature of the long-term mechanism as it applies to one error ~~type~~ type; as well as, the same issues raised with the Customer Service Inquiry (“CSI”) Accuracy ~~Compliance~~ Plan (the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, the scope of testing<sup>3</sup>, and the potential need for a performance measure<sup>4</sup>). SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of DL/DA:

### **1. System and Process Enhancements**

- SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt (“MOR”) files to the Advance Listing Products and Services System (“ALPSS”); in December 2002.<sup>5</sup>
  - This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the update.
  - This enhancement will ensure an improvement in timely receipt of mechanized orders, as manual intervention will be minimized/eliminated.
- SBC implemented an interim manual work process in December 2002, to resolve ALPSS errors identified in the “Skipped Section Report”<sup>6</sup> within three business days.<sup>7</sup>
  - This new daily work process will ensure the minimization of “Skipped Section Report” backlogs ~~and in turn~~ and in turn, will improve the timely

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<sup>3</sup> However, as noted below, BearingPoint will conduct an evaluation based on sampling of actual commercial production orders that include a diverse set of product and listings types.

<sup>4</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 23, ¶¶ 57-61. SBC does not believe that a separate performance measure is necessary. Performance measure changes are generally discussed in the performance measure six-month review; one of which is just concluding.

<sup>5</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 25, ¶ 57. SBC has provided detail on the vendor updates and the issues that it addresses. This update address all non-UNE-P and non-resale order issues identified in the BearingPoint test since these other orders are transmitted directly to ALPSS from MOR.

<sup>6</sup> The “Skipped Section Report” is produced daily and contains service orders which could not be added to the APLSS system due to unanticipated error conditions (e.g. duplicate telephone number, corrupted data, etc). This report is used to investigate the root cause and the necessary corrective action to resolve these errors.

<sup>7</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 58. SBC has provided details explaining the issue being addressed by the interim manual process.

## **Draft DL/DA Update Accuracy Compliance Plan**

handling of errors identified by ALPSS. As a result, the DL/DA update accuracy will improve through better error handling.

- SBC will implement a long term mechanical process to route orders identified by the “Skipped Section Report” into the established ALPSS error handling process by March 1, 2003.<sup>8</sup>
  - While not replacing the “Skipped Section Report” manual work process, this enhancement will further automate the ALPSS error handling and minimize manual processes by better identifying errors that would otherwise be handled manually.

~~SBC is taking the following steps to improve the accuracy of DL/DA updates:~~

### **2. Service Representative Training**

SBC developed for Local Service Center (“LSC”) ~~Service Representatives~~ service representatives a Service Order Quality informational package<sup>9</sup> directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing SBC Customer ACIS Information System (“ACIS”) service orders. This package provides information such as ~~SBC management’s commitment to quality order processing~~, the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, ~~2002~~.

2002, and applies across the entire SBC Midwest region.

- Starting in January 2003<sup>10</sup>, service representatives will receive training using the Service Order Quality informational package.
  - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
  - Review of the package is accomplished in mandatory training sessions facilitated by SBC’s Training Department. Logs will be maintained to track attendance and manage attendance compliance.
  - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management’s commitment to this process: service order accuracy.

### **3. DL/DA Quality Review**

<sup>8</sup> ——— See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 59. SBC has provided details explaining what the long term mechanism addresses.

<sup>9</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

<sup>10</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this plan to address specific timeframes for each action item, including component items of each action item.

## **Draft DL/DA Update Accuracy Compliance Plan**

- SBC is designing an internal quality review process for DL/DA update accuracy-accuracy<sup>11</sup>. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling (“manual-manual” and “auto-manual”) to monitor DL/DA accuracy<sup>12</sup>. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders. While SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: update accuracy. This mechanism will enable SBC to monitorMonitoring the effectiveness of its training and help ing identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month. These quality reviews will be conducted on an a frequent, on goingongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which(DSS). DSS is a reporting system used by the LSC to track and capture information on order activity.
- activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and status:process type. Sampled orders will come from pending orders, i.e., orders not yet completed.both manual-manual and auto-manual orders.
- Quality Assurance (“QA”) service representatives, experienced service representatives selected for this purpose, will conduct reviews using Methods and Proceduresmethods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
  - Verify that discrepancies are in fact errors;
  - Correct identified errors on pending orders;
  - Identify root causes of errors;
  - Provide the basis for individual coaching of service representatives.

<sup>11</sup> See AT&T's comments filed 11/15/02, Connelly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

<sup>12</sup> See AT&T's comments filed 11/15/02, Connelly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint's benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to re-test all product types.

## **Draft DL/DA Update Accuracy Compliance Plan**

- The QA service representatives will compare the CLEC LSC Local Service Request to the corresponding internal service order on a field by field basis. Corrections will be made as necessary prior to order completion.

### **4. Corrective Actions**

- SBC plans to address discrepancies identified during its quality reviews as described above<sup>13</sup> in the following manner:
  - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
  - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
  - This information will be used to determine whether individual service representative coaching is needed, or if additional training, and/or changes to processes, and/or methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to changes to processes, processes or systems systems and/or additional training.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
<b>System-Related Tasks</b>			
1. Implement system changes to allow automated daily file transfers of MOR files to AAS/IT	10/28/02	12/31/02	Completed
A. Develop and test AAS/IT Interface software modification	10/28/02	11/01/02	Completed
B. Develop MOR Interface modification	10/28/02	11/01/02	Completed
C. Install MOR Interface modification	11/10/02	12/31/02	Completed
2. Implement interim manual work process for ALPSS errors identified in the "Skipped Section Report" within three business days	10/01/02	Ongoing	In progress
A. Review existing process to determine backlog avoidance	10/01/02	11/01/02	Completed
B. Implement interim manual work process	11/01/02	12/01/02	Completed
C. Managers report weekly backlog information (numbers, age, etc.)	12/01/02	Ongoing	In progress

<sup>13</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will address accuracy improvement and maintenance. SBC has expanded the detail provided in this plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.



## Draft DL/DA Update Accuracy Compliance Plan

Task	Begin	End	Status
<del>- D. Manager evaluates Skipped Section Report and takes action to ensure a backlog does not occur</del>	<del>12/01/02</del>	<del>Ongoing</del>	<del>In progress</del>
<del>- D. Manager evaluates "Skipped Section Report" and takes action to ensure a backlog does not occur</del>	<del>12/01/02</del>	<del>Ongoing</del>	<del>In progress</del>
<del>3. Implement system changes to ALPSS error handling process to route orders identified by the "Skipped Section Report"</del>	<del>11/13/02</del>	<del>03/03/03</del>	<del>In progress</del>
<del>- A. Receive ALPSS new software version from vendor</del>	<del>11/13/02</del>	<del>11/13/02</del>	<del>Completed</del>
<del>3. Implement system changes to ALPSS error handling process to route listings identified by the "Skipped Section Report"</del>	<del>11/13/02</del>	<del>03/03/03</del>	<del>Completed</del>
<del>- A. Receive ALPSS new software version from vendor</del>	<del>11/13/02</del>	<del>11/13/02</del>	<del>Completed</del>
<del>- B. Perform testing</del>	<del>11/14/02</del>	<del>02/02/03</del>	<del>In progress</del>
<del>- B. Perform testing</del>	<del>11/14/02</del>	<del>02/02/03</del>	<del>Completed</del>
<del>- C. Installed in production</del>	<del>03/01/03</del>	<del>03/03/03</del>	<del>Completed</del>
<del>- C. Installed in production</del>	<del>03/01/03</del>	<del>03/03/03</del>	<del>Completed</del>
<b>Quality Assurance-Related Tasks</b>			
<del>4. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.</del>	<del>11/15/02</del>	<del>5/31/03</del>	<del>In progress</del>
<del>1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.</del>	<del>11/15/02</del>	<del>5/31/03</del>	<del>In progress</del>
<del>A. Determine and assign resource to lead "informational package" development effort</del>	<del>11/15/02</del>	<del>12/31/02</del>	<del>Complete</del>
<del>B. Produce "informational package"</del>	<del>12/01/02</del>	<del>12/31/02</del>	<del>Complete</del>
<del>C. Determine training deployment method</del>	<del>12/01/02</del>	<del>01/06/03</del>	<del>Complete</del>
<del>D. Create training schedule or plan</del>	<del>12/01/02</del>	<del>01/14/03</del>	<del>Complete</del>
<del>E. Conduct training</del>	<del>01/15/03</del>	<del>05/31/03</del>	<del>In progress</del>
<del>5. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform ("UNE-P") and Resale orders.</del>	<del>12/15/02</del>	<del>Ongoing</del>	<del>In progress</del>
<del>2. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.</del>	<del>12/15/02</del>	<del>Ongoing</del>	<del>In progress</del>
<del>A. Design quality review process</del>	<del>12/15/02</del>	<del>1/31/03</del>	<del>Complete</del>
<del>- B. Implement daily quality review of Resale and UNE-P Complex orders</del>	<del>02/03/03</del>	<del>Ongoing</del>	<del>In progress</del>

## Draft DL/DA Update Accuracy Compliance Plan

Task	Begin	End	Status
<u>B. Implement daily quality review of Resale and UNE - P orders</u>	<u>02/03/03</u>	<u>Ongoing</u>	<u>In progress</u>
<del>6. Identify root causes of errors identified by quality review and sampling processes</del>	<del>12/15/02</del>	<del>Ongoing</del>	<del>In progress</del>
<u>3. Identify root causes of errors identified by quality review and sampling processes</u>	<u>12/15/02</u>	<u>Ongoing</u>	<u>In progress</u>
<del>A. Develop identification and tracking process</del>	<del>12/15/02</del>	<del>2/5/03</del>	<del>In progress</del>
<u>A. Develop identification and tracking process</u>	<u>12/15/02</u>	<u>2/5/03</u>	<u>Completed</u>
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in this plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.
- The third party will report the accuracy of DL/DA updates by comparing updates with local service requests using an unbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the and with the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. This accuracy of DL/DA updates is expected to improve when compared to BearingPoint's test results of 91.2% accurate. SBC's target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

The third party will review accuracy of DL/DA updates by comparing updates with local service requests using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and the Commission staff prior to its implementation.



**~~Draft~~ DL/DA Update Accuracy ~~Compliance~~ Plan**

~~The third party will affirm SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's self-audit results.~~

- ~~• SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the Commission by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.~~



**MPSC Case No. U-12320**

**Special and UNE Circuit Repair  
Coding Accuracy Plan**

**March 13, 2003**

**Repair Coding Accuracy Plan**

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## Repair Coding Accuracy Plan

### 1. Purpose

The purpose of this plan is to describe the actions SBC Midwest (“SBC”) proposes to take to improve accuracy and completeness<sup>1</sup> of closeout codes upon repair completion for Special Circuits and Unbundled Network Elements (UNEs). In Michigan, SBC originally proposed a trouble report closeout code improvement plan on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with repair coding accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 45, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC’s implementation of this plan.

### 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems (“OSS”) testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special and UNE circuits. The initial exception report for Michigan had included benchmark failures for Resale, UNE and Special circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in August 2002 and reported that while Resale circuits had passed their test requirements, UNE and Special Circuits had not. This exception encompassed all five Midwest states. BearingPoint’s October 30, 2002 Michigan OSS Evaluation Project Report found that test criteria for TVV7-12 (p. 987) and TVV7-14 (p. 989) were “not satisfied.” The UNE coding has successfully closed in the other four SBC Midwest states and Special coding remains in retest in Illinois. Wisconsin has successfully completed Special circuit coding retesting.

In response to BearingPoint’s evaluation, SBC has identified areas for improvement and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented<sup>2</sup>. In its final retest in Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special circuits were coded correctly. Because these coding results were in parity with retail coding and SBC completed successful testing on trouble repair itself, these coding results did not result in a negative finding in regard to maintenance and repair (“M&R”) nondiscriminatory access. See MPSC Report, January 3, 2003 at p. 71.

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<sup>1</sup> AT&T stated, “accuracy is equally important as completeness.” See, 11/15/02 Connolly Affidavit, p. 36, para 83

<sup>2</sup> The retest in Michigan was completed prior to the implementation of these initiatives.

### 3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office, either directly or through the Overall Control Center (“OCO”) which encompasses the Local Operations Center (“LOC”), the Special Services Center (“SSC”), and the Customer Service Bureau (“CSB”). When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which a fault inserted by BearingPoint were subsequently reported as “No Trouble Found” (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit was subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

Very few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. Most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits<sup>3</sup> and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as “NTF”.

For items that fell within Situation #2 and #3, the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Although such performance is unacceptable, it did not have a significant impact on either CLEC billing or repair performance reporting. Indeed in Michigan, of the 25 reported errors in coding (out of 136 total retests)<sup>4</sup>, only 3 would have resulted in either inappropriate billing or erroneous exclusion of data from performance results. This represents an overall billing/performance error rate of only 2.2 percent.

Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician or maintenance administrator. These types of closeout errors had no impact on overall billing/performance error rate because they incorrectly coded where in the SBC network that the fault was corrected.

Accordingly, with the exception of Situation # 1, the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators (“MAs”).

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<sup>3</sup> Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

<sup>4</sup> See BearingPoint Exception 131 Additional Information, August 29, 2002

## Repair Coding Accuracy Plan

### 4. Actions

The internal improvement plan proposed by SBC in its October 30, 2002 Filing was constructed to address the accuracy of trouble ticket closure coding for Special circuit and UNE repairs for various types of trouble conditions found including troubles noted as “No Trouble Found” (“NTF”) and Customer Premises Equipment (“CPE”). The plan included many of the steps identified in this plan.

The MPSC in its January 13 Order directed that an independent third party verify the results achieved from this plan. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. In its comments, AT&T stated that the MPSC should require SBC to address this coding issue and stated that incorrect coding could lead to incorrect performance measurement results reporting. Further, AT&T was concerned that under SBC’s proposed Improvement Plan, the original source information would not be available for review.<sup>5</sup> AT&T also questioned the relationship between SBC’s proposed monthly quality reviews and improved accuracy and completeness of closeout coding. SBC has addressed the requirements of the MPSC and the comments of AT&T in the following enhanced plan.

The following activities identify the steps that SBC has taken or plans to take to improve the accuracy and completeness of trouble ticket closure coding for Special circuit and UNE repairs.

#### **Documentation Updates:**

During the course of its investigation of the errors noted by BearingPoint in Exception 131, SBC has initiated a number of improvements in the documentation available to technicians and their managers on proper coding techniques and application. These improvements include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators to take that will improve coding accuracy when a mechanized loop test (“MLT”) indicates “Open Out”<sup>6</sup> following a circuit retest. MAs

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<sup>5</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.

<sup>6</sup> “Open out” condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

## **Repair Coding Accuracy Plan**

and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.

- SBC updated internal Methods and Procedures (“M&P”) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
  - Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications.
    - Awareness sessions were conducted 8/23/02 through 11/05/02 to review updated procedures.
  - A LOC “Flash” (02RC49) was issued 8/26/02 to reflect the new disposition codes.
  - The CSB Handbook was updated 8/26/02 to reflect the new disposition codes.
    - Issued a CSB “Flash” to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for documenting corrective maintenance trouble tickets in central offices (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 (“CO Managers Frame Reference Guide – AIT Region”).

### **Training Review Sessions:**

SBC has conducted comprehensive awareness and training sessions with personnel in each of the four work groups involved in trouble ticket closures. In those states where BearingPoint testing continued beyond the date(s) when such sessions were completed, test results indicated marked improvement in coding performance. These sessions included:

- SBC conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all I&R Operations Center personnel were completed by August 13, 2002. A “Cable Multiple” ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (“CTTN”). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not “detached” and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I & R Operations Center

## **Repair Coding Accuracy Plan**

employees through Awareness Sessions conducted between August 8 and August 15, 2002.

- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
  - Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002.
  - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.
- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana and Illinois<sup>7</sup> manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.
- On February 10, 2003, the LOC began conducting workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.
- On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.
- Additional review sessions will be conducted within each of the four work groups (i.e., LOC, I&R, Special Services Center and Central Office) on an as-needed basis, dependent upon the results of the management review activities described below.

### **Management Review Activities**

To verify that the improvements to documentation and the training/awareness sessions have had the desired affect (i.e., improvement in coding performance), SBC is conducting its own internal reviews of trouble ticket closures in each of the four work groups involved. These reviews focus both on closeout coding in general, as well as specific problems brought to the attention of SBC by individual CLECs (e.g., NTFs). These reviews include:

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<sup>7</sup> Since Wisconsin passed, trouble ticket coding these review sessions were not conducted.



## **Repair Coding Accuracy Plan**

### **1) LOC:**

- On October 30, 2002, LOC management had initiated monthly quality reviews of coding accuracy on employee trouble tickets closures.
- In December 2002, LOC management had also initiated bimonthly random reviews of trouble ticket closures. The results of these reviews are tracked and reported via an internal shared-access tracking mechanism.
- On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets. LOC MAs will be required to receive approval prior to closing a trouble ticket until an individual 95% accuracy rate is achieved.
- On February 10, 2003 LOC management also initiated a daily review of the prior day's UNE-Loop trouble ticket closures to validate correct trouble ticket and analysis codes. Individual MA errors are provided to the involved employee as well as the LOC staff, both as a method to improve the individual accuracy, as well as identify common misinterpretations.

### **2) Special Services Center**

- To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

### **3) I&R Centers**

- The I&R management will incorporate coding accuracy into the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special and UNE circuit trouble reports.

### **4) Central Office**

- Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Michigan will be reviewed for narrative and coding accuracy.

In addition to these targeted coding review sessions SBC has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC will initiate new training/awareness sessions with the groups involved.

## Repair Coding Accuracy Plan

SBC acknowledges that the “original source information” as noted by AT&T<sup>8</sup> is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party evaluation.

The following provides the timelines and current status of each of the items contained in the actions noted above:

Task	Begin	End	Status
1. Update documentation for Cause Code 600	6/01//02	06/30/02	Complete
2. Update LOC Job Aid JA-27B	07/31/02	08/01/02	Complete
A. Conduct Job Aid Training	08/01/02	08/09/02	Complete
3. Develop “awareness” training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for “Cable Multiple” trouble tickets	08/01/02	08/08/02	Complete
A. Conduct “Awareness” sessions	08/08/02	08/15/02	Complete
4. Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	8/10/02	08/11/02	Complete
A. Conduct awareness sessions	08/11/02	08/12/02	Complete
5. Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.			
A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Complete
B. Conduct I&R awareness sessions to review updated job aids	08/23/02	11/5/02	Complete
C. Issue LOC “Flash” to advise of new disposition codes	08/26/02	08/26/02	Complete
E. Issue CSB “Flash” to advise of handbook updates with new disposition codes	08/26/02	08/26/02	Complete
6. LOC management initiates “Ticket Closure Approval Team” for Resale/UNE-P	02/10/03	Ongoing	Ongoing
7. LOC management initiates “Trouble Closure Review” of UNE-Loop tickets closed by LOC	2/10/03	Ongoing	Ongoing
8. LOC will initiate ongoing workshops to review proper coding procedures as needed	10/30/02	Ongoing	Ongoing
9. Conduct LOC monthly reviews on employee trouble ticket	12/01/02	Ongoing	Ongoing

<sup>8</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83

<sup>9</sup> BearingPoint may elect to affirm SBC’s documentation improvements and internal reviews prior to this date.

## Repair Coding Accuracy Plan

Task	Begin	End	Status
closures			
10. LOC management will conduct bimonthly random reviews of trouble ticket closures	12/16/02	12/16/02	Complete
11. Update Central Office M&P for trouble ticket closure			
A. Conduct review sessions with Central Office technicians	12/17/02	01/31/03	Complete
B. Initiate internal reviews of closed CLEC trouble tickets	03/01/03	Ongoing	Ongoing
12. Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Complete
13. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02	Ongoing	Ongoing
14. Incorporate quality reviews of trouble tickets into current I&R quality control measures	12/01/02	Ongoing	Ongoing
15. Expected start of BearingPoint testing <sup>9</sup>	07/01/03		

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.
- The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found for UNE and Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and the MPSC staff prior to its implementation. In addition, BearingPoint may supplement its analysis using "ride-alongs" with repair technicians, consistent with its standard evaluation practices for UNE trouble reports in Michigan. SBC expects BearingPoint will begin its analysis of commercial

## **Repair Coding Accuracy Plan**

production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy and completeness of closure codes for Special Circuit and UNE repairs is expected to improve when compared to BearingPoint's test results of 82.1% for Special Circuits and 84.8% for UNE<sup>10</sup>. SBC's target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC.

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.

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<sup>10</sup> See BearingPoint Exception 131, Disposition Report, December 20, 2002



**MPSC Case No. U-12320**

**~~Draft Compliance Plan~~**

**~~For~~**

**~~Special Service and UNE Repair Coding Accuracy~~**

**~~February 13, 2003~~**

**Special and UNE Circuit Repair  
Coding Accuracy Plan**

**March 13, 2003**



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Repair Coding Accuracy Plan

Purpose



## Repair Coding Accuracy Plan

### 1. Purpose

The purpose of this ~~draft compliance~~ plan is to describe the actions ~~Michigan Bell Telephone Company~~~~SBC Midwest~~ ("SBC") proposes to take to improve accuracy and completeness<sup>1</sup> of closeout codes upon repair completion for Special ~~Services~~~~Circuits~~ and Unbundled Network Elements (~~"UNEs"~~)(~~UNEs~~). ~~In Michigan~~, SBC originally proposed a trouble report closeout code improvement plan on October 30, 2002 ("October 30 ~~Compliance~~ Filing"). ~~As directed by Pursuant to~~ the Michigan Public Service Commission's ("MPSC's") Order issued on January 13, 2003 ("January 13 Order"), in Case No. ~~U-12320~~, ~~this draft has been revised to be a compliance plan that addresses~~U-12320 (SBC's §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with repair coding accuracy identified in BearingPoint's Report, ~~as well as and~~ those discussed in the technical workshop and submitted in written comments. SBC ~~recognizes that further modifications to this plan may be appropriate based on further modified this plan based on input received during~~ the collaborative session ~~scheduled for March 4-5, 2003. SBC will submit a modified compliance plan to the MPSC~~held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and ~~by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC's implementation of the final compliance~~this plan.

### 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems (~~"OSS"~~)(~~"OSS"~~) testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special~~Service~~ and UNE circuits. The initial exception report for Michigan had included benchmark failures for Resale, UNE and Special~~Service~~ circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in August 2002 and reported that while Resale circuits had passed their test requirements, UNE and Special ~~Service~~ ~~circuits~~~~Circuits~~ had not. This exception encompassed all five ~~of the former Ameritech ("SBC Midwest")~~Midwest states. BearingPoint's October 30, 2002 Michigan OSS Test Evaluation Project Report found that test criteria for TVV7-12 (p. 987) and TVV7-14 (p. 989) were "not satisfied." ~~In its final retest for Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special Service closeouts were coded correctly.~~ The UNE coding~~exception~~ has successfully closed in the other four SBC Midwest ~~states. Special Service~~states and Special coding remains in retest in ~~Illinois, while Ohio, Indiana, and Illinois.~~ Wisconsin ~~have has~~ successfully completed Special ~~Service coding retesting.~~circuit coding retesting.

<sup>1</sup> ~~AT&T~~ stated, "accuracy is equally important as completeness." See, 11/15/02 Connolly Affidavit, p. 36, para 83

## Repair Coding Accuracy Plan

In response to BearingPoint's evaluation, SBC has identified problem areas for improvement and implemented a number of corrective measures. ~~These corrective measures have measures,~~ which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented<sup>2</sup>. In its final retest in Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special circuits were coded ~~correctly~~. correctly. Because these coding results were in parity with retail coding and SBC completed successful testing on trouble repair itself, these coding results did not result in a negative finding in regard to maintenance and repair ("M&R") nondiscriminatory access. See MPSC Report, January 3, 2003 at p. 71.

### 3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office, either directly or through the Overall Control Center ("OCO") which encompasses the Local Operations Center ("LOC"), the Special Services Center ("SSC"), and the Customer Service Bureau ("CSB"). When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which a fault inserted by BearingPoint were subsequently reported as "No Trouble Found" (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit was subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

~~A~~Very few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. ~~However, most~~Most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits<sup>3</sup> and repaired them as well. The technician corrected the multiple faults, but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when ~~subsequent~~ subsequent dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as "NTF".

For items that fell within Situation #2 and #3, the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Although such performance is unacceptable, it did not have a significant impact on either CLEC billing or repair

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<sup>2</sup> ——— The retest in Michigan was completed prior to the implementation of these initiatives.

<sup>3</sup> ——— Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

## Repair Coding Accuracy Plan

performance reporting. Indeed in Michigan, of the 25 reported errors in coding (out of 136 total retests)<sup>4</sup>, only 3 would have resulted in either inappropriate billing or erroneous exclusion of data from performance results. This represents an overall billing/performance error rate of only 2.2 percent.

Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician or maintenance administrator. These types of closeout errors had no impact on overall billing/performance error rate because they incorrectly coded where in the SBC network that the fault was corrected.

Accordingly, with the exception of Situation # 1, the root cause for incorrect close out codes was repair technician error, either in the field, in the central office, or by the LOC Maintenance Administrators (MAs).(“MAs”).

## 4. Actions

The internal improvement plan proposed by SBC in its October 30, 2002 filingFiling was constructed to address the accuracy of trouble ticket closure coding for Special circuit and UNE repairs for various types of trouble conditions found including troubles noted as “No Trouble Found” (“NTF”) and Customer Premises Equipment special service and UNE repairs (“CPE”). The plan included many of the steps identified in the proposed compliancethis plan.

InThe MPSC in its January 13 Order, the MPSC directed that the repair coding accuracy improvement issue be addressed via a compliance plan so that an independent third party can verify the results achieved from this plan. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. In its comments, AT&T stated that the MPSC should require SBC to address this coding issue and stated that incorrect coding could lead to incorrect performance measurement results reporting. Further, AT&T was concerned that under SBC’s proposed Improvement Plan, the original source information would not be available for review.<sup>5</sup> AT&T also questioned the relationship between SBC’s proposed monthly quality reviews and improved accuracy and completeness of closeout coding. SBC has addressed the requirements of the MPSC and the comments of AT&T in the following enhanced plan.

The following activities identify the steps that SBC has taken or plans to take to improve the accuracy and completeness of trouble ticket closure coding for special serviceSpecial circuit and UNE repairs.

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<sup>4</sup> See BearingPoint Exception 131 Additional Information, August 29, 2002

<sup>5</sup> ——— See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.

## Repair Coding Accuracy Plan

### Documentation Updates

#### Documentation Updates:

During the course of its investigation of the errors noted by BearingPoint in Exception 131, SBC has initiated a number of improvements in the documentation available to technicians and their managers on proper coding techniques and application. These improvements include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special ~~Service~~ and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center (~~“LOC”~~) Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators (~~“MA”~~) to take that will improve coding accuracy when a mechanized loop test (“MLT”) indicates “Open Out”<sup>6</sup> following a circuit retest. ~~All~~ MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.
- SBC updated internal Methods and Procedures (“M&P”) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
  - Installation and Repair (~~“I&R”~~)(I&R) internal Job Aids (JA 170 - August ~~20 & JA 43~~ August 30, 2002) ~~were~~20 was updated to reflect the M&P changes/clarifications.
    - Awareness sessions were conducted 8/23/02 ~~thru~~through 11/05/02 to review updated procedures.
  - A LOC “Flash” (02RC49) was issued 8/26/02 to reflect the new disposition codes.
  - The ~~Customer Service Bureau~~ (~~“CSB”~~)CSB Handbook was updated 8/26/02 to reflect the new disposition codes.
    - Issued a CSB “Flash” to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for ~~trouble ticket coding~~documenting corrective

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<sup>6</sup> ——— “Open out” condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

## Repair Coding Accuracy Plan

~~maintenance trouble tickets in central offices (“COs”). Review sessions were conducted through January 31, 2003 with all SBC Midwest Central Office technicians to review the newly created Methods and Procedures. The new coding process (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 (“CO “Frame Management Plan”, which is an ongoing quality control measure utilized by the Central Office management. Managers Frame Reference Guide – AIT Region”).~~

### Training Review Sessions Sessions:

SBC has conducted comprehensive awareness and training sessions with personnel in each of the four work groups involved in trouble ticket closures. In those states where BearingPoint testing continued beyond the date(s) when such sessions were completed, test results indicated marked improvement in coding performance. These sessions included:

- SBC conducted training review sessions ~~(aka(a/k/a~~ awareness sessions) to reinforce current procedures used ~~to for the~~ close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number.
  - Sessions covering all I&R Operations Center personnel were completed by August 13, 2002.
  - A “Cable Multiple” ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (“CTTN”).
    - SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not “detached” and tested to confirm restoration of the reported trouble.
- Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I & R Operations Center employees through Awareness Sessions conducted between August 8 and August 15, 2002.
- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
  - Sessions covering ~~all~~ Installation and Repair ~~(I&R)~~ field technicians in all manager groups were completed by August 12, 2002.
  - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.

## Repair Coding Accuracy Plan

- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed<sup>7</sup> by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana and Illinois<sup>7</sup> manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.
- On February 10, 2003, the LOC began ~~to conduct~~conducting workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.
- On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.
- Additional review sessions will be conducted within each of the four work groups (i.e., LOC, I&R, Special Services Center and Central Office) on an as-needed basis, dependent upon the results of the management review activities described below.

### Management Review Activities

To verify that the improvements to documentation and the training/awareness sessions have had the desired affect (i.e., improvement in coding performance), SBC is conducting its own internal reviews of trouble ticket closures in each of the four work groups involved. These reviews focus both on closeout coding in general, as well as specific problems brought to the attention of SBC by individual CLECs (e.g., NTFs). These reviews include:

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<sup>7</sup> Since Wisconsin passed, trouble ticket coding these review sessions were not conducted.

## Repair Coding Accuracy Plan

### 1) LOC:

- On October 30, 2002, LOC management had initiated monthly quality reviews of coding accuracy on all employee trouble tickets closures.
- In December 2002, LOC management had also initiated bi-monthly random reviews of trouble ticket closures. The results of these reviews will be tracked and reported via an internal intranet shared-access tracking mechanism.
- On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets. Each LOC MA s will be required to receive approval prior to closing a trouble ticket until an individual 95% accuracy rate is achieved.
- On February 10, 2003 LOC management also initiated a daily review of the prior day's UNE-Loop trouble ticket closures to validate correct trouble ticket and analysis codes. Individual MA errors are provided to the involved employee as well as the LOC staff, both as a method to improve the individual accuracy, as well as identify common misinterpretations.

### 2) Special Services Center

- To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

### 3) I&R Centers

- The I&R management will use incorporate coding accuracy into the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special Service and UNE circuit trouble reports.

### 4) Central Office

- Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Michigan will be reviewed for narrative and coding accuracy.

In addition to these targeted coding review sessions SBC has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC will initiate new training/awareness sessions with the groups involved.

### Repair Coding Accuracy Plan

SBC acknowledges that the “original source information<sup>8</sup>” as noted by AT&T<sup>8</sup> is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party Compliance evaluation.

The following provides the timelines and current status of each of the items contained in the actions noted above:

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<sup>8</sup> — See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.



## Repair Coding Accuracy Plan

Task	Begin	End	Status
1. Update documentation for Cause Code 600	6/01/02	06/30/02	Complete
2. Update LOC Job Aid JA-27B	07/31/02	08/01/02	Complete
A. Conduct Job Aid Training	08/01/02	08/09/02	Complete
3. Develop "awareness" training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets	08/01/02	08/08/02	Complete
A. Conduct "Awareness" sessions	08/08/02	08/15/02	Complete
4. Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	8/10/02	08/11/02	Complete
A. Conduct awareness sessions			
5. Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.	08/11/02	08/12/02	Complete
A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Complete
B. Conduct I&R awareness sessions to review updated job aids			
C. Issue LOC "Flash" to advise of new disposition codes	08/23/02	11/5/02	Complete
E. Issue CSB "Flash" to advise of handbook updates with new disposition codes	08/26/02	08/26/02	Complete
	08/26/02	08/26/02	Complete
6. LOC management initiates "Ticket Closure Approval Team"			
7. LOC will initiate ongoing workshops to review proper coding procedures	02/10/03		Ongoing
	2/10/03		Ongoing
8. Conduct LOC monthly reviews on all employee trouble ticket closures			
	10/30/02		Ongoing
9. LOC management will conduct bi-monthly random reviews of trouble ticket closures			
	12/01/02		Ongoing
10. Update Central Office M&P for trouble ticket closure			
A. Conduct review sessions with Central Office technicians	12/16/02	12/16/02	Complete
B. Incorporate trouble ticket coding reviews into the "Frame Management Plan"	12/17/02	01/31/03	Complete
	01/01/03		Ongoing
11. Conduct review training sessions with Special Service Center personnel			
12. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	11/20/02	11/25/02	Complete
13. Incorporate quality reviews of trouble tickets into current I&R quality control measures	12/01/02		Ongoing
	12/01/02		Ongoing

## Repair Coding Accuracy Plan

Task	Begin	End	Status
<u>1. Update documentation for Cause Code 600</u>	<u>6/01/02</u>	<u>06/30/02</u>	<u>Complete</u>
<u>2. Update LOC Job Aid JA-27B</u>	<u>07/31/02</u>	<u>08/01/02</u>	<u>Complete</u>
<u>    A. Conduct Job Aid Training</u>	<u>08/01/02</u>	<u>08/09/02</u>	<u>Complete</u>
<u>3. Develop "awareness" training and conduct sessions with Installation &amp; Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets</u>	<u>08/01/02</u>	<u>08/08/02</u>	<u>Complete</u>
<u>    A. Conduct "Awareness" sessions</u>	<u>08/08/02</u>	<u>08/15/02</u>	<u>Complete</u>
<u>4. Develop awareness training for I&amp;R personnel to reinforce coding of trouble tickets when multiple faults are on the same line</u>	<u>8/10/02</u>	<u>08/11/02</u>	<u>Complete</u>
<u>    A. Conduct awareness sessions</u>	<u>08/11/02</u>	<u>08/12/02</u>	<u>Complete</u>
<u>5. Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.</u>			
<u>    A. I&amp;R internal job aids were updated to reflect M&amp;P changes/clarification</u>	<u>08/20/02</u>	<u>08/30/02</u>	<u>Complete</u>
<u>    B. Conduct I&amp;R awareness sessions to review updated job aids</u>	<u>08/23/02</u>	<u>11/5/02</u>	<u>Complete</u>
<u>    C. Issue LOC "Flash" to advise of new disposition codes</u>	<u>08/26/02</u>	<u>08/26/02</u>	<u>Complete</u>
<u>    E. Issue CSB "Flash" to advise of handbook updates with new disposition codes</u>	<u>08/26/02</u>	<u>08/26/02</u>	<u>Complete</u>
<u>6. LOC management initiates "Ticket Closure Approval Team" for Resale/UNE-P</u>	<u>02/10/03</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>7. LOC management initiates "Trouble Closure Review" of UNE-Loop tickets closed by LOC</u>	<u>2/10/03</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>8. LOC will initiate ongoing workshops to review proper coding procedures as needed</u>	<u>10/30/02</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>9. Conduct LOC monthly reviews on employee trouble ticket closures</u>	<u>12/01/02</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>10. LOC management will conduct bimonthly random reviews of trouble ticket closures</u>	<u>12/16/02</u>	<u>12/16/02</u>	<u>Complete</u>
<u>11. Update Central Office M&amp;P for trouble ticket closure</u>			
<u>    A. Conduct review sessions with Central Office technicians</u>	<u>12/17/02</u>	<u>01/31/03</u>	<u>Complete</u>
<u>    B. Initiate internal reviews of closed CLEC trouble</u>	<u>03/01/03</u>	<u>Ongoing</u>	<u>Ongoing</u>

<sup>9</sup> BearingPoint may elect to affirm SBC's documentation improvements and internal reviews prior to this date.

## Repair Coding Accuracy Plan

Task	Begin	End	Status
<u>tickets</u>			
<u>12. Conduct review training sessions with Special Service Center personnel</u>	<u>11/20/02</u>	<u>11/25/02</u>	<u>Complete</u>
<u>13. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures</u>	<u>12/01/02</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>14. Incorporate quality reviews of trouble tickets into current I&amp;R quality control measures</u>	<u>12/01/02</u>	<u>Ongoing</u>	<u>Ongoing</u>
<u>15. Expected start of BearingPoint testing<sup>9</sup></u>	<u>07/01/03</u>		

## 5. Third Party Examination Approach

~~? Since training and awareness sessions have been completed, after an appropriate period of internal monitoring and review as set by SBC, the accuracy and completeness of closure codes for special services and UNE repairs is expected to improve when compared to BearingPoint's test results of 82.1% for special services and 84.8% for UNE. SBC's target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Service Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC and SBC. While~~This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following: a process evaluation and a review of actual commercial transactions as follows:

~~?~~

- ~~•The third party will review coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with MPSC staff prior to its implementation~~
- ~~•The third party will affirm SBC's implementation~~evaluate SBC's implementations of the actions described in this compliance the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as

## Repair Coding Accuracy Plan

deemed necessary by the third party. This evaluation will include a review of SBC's self-audit results.

quality review results. SBC expects this

- process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.
- The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found for UNE and Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and the MPSC staff prior to its implementation. In addition, BearingPoint may supplement its analysis using "ride-alongs" with repair technicians, consistent with its standard evaluation practices for UNE trouble reports in Michigan. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy and completeness of closure codes for Special Circuit and UNE repairs is expected to improve when compared to BearingPoint's test results of 82.1% for Special Circuits and 84.8% for UNE<sup>10</sup>. SBC's target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC.
- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.

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<sup>10</sup> See BearingPoint Exception 131, Disposition Report, December 20, 2002



**MPSC Case No. U-12320**

**Line Loss Notifier Communications Plan**

**March 13, 2003**

# **Line Loss Notifier Communications Plan**

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## Line Loss Notifier Communications Plan

### 1. Purpose

The purpose of this plan is to describe action Michigan Bell Telephone Company (“SBC”) has taken and will take to improve communications regarding line loss notifiers (“LLNs”). This plan was first filed on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding operational concerns with LLNs and monthly reporting to the MPSC regarding such line loss issues for a minimum period of six months. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

Specifically, this plan details the communications process that will be used when SBC determines that an interruption of LLNs could affect more than one CLEC (though this scenario is also covered). It also describes the monthly report that SBC will provide to the MPSC for at least six months following approval of the plan by the MPSC.<sup>1</sup>

### 2. Issue

BearingPoint, Inc. (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems (“OSS”) testing. Two types of tests were performed: one using Test CLEC transactions that tested the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). Both of these tests initially resulted in the issuance of Exceptions (74 and 94), however each test was concluded satisfactorily through subsequent retesting by BearingPoint.

In its October 14, 2002 Disposition Report for Exception 74 regarding Test CLEC line loss testing, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.2% success rate, “the issues identified in this Exception Report have been addressed.” This finding, coupled with BearingPoint’s test results associated with Exception 94 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs. BearingPoint’s line loss test results are contained in its October 30, 2001 Michigan OSS Evaluation Project Report as TVV4-28 (accuracy) and TVV4-29 (timeliness) at pp. 935-936.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Filing, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held on October 14 - 18, 2003. Based on subsequent

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<sup>1</sup> This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13, and the creation of an additional measure MI 13.1, were approved by the MPSC on February 20, 2002 in Case No. U-11830 and will be implemented for March 2003 results, reported in April 2003.

## **Line Loss Notifier Communications Plan**

CLEC comments regarding that plan, the MPSC's direction in its January 13 Order, and the aforementioned Collaborative activity in March 2003, SBC has enhanced that plan.

### **3. Actions**

#### **A. Definition of Line Loss Notification Interruption**

A "line loss notification interruption" would require the issuance of an accessible letter to all CLECs in the Midwest region, if it affected more than one CLEC. The "line loss notification interruption", which includes any winback situations, would be included in the monthly report filed with the MPSC if it affected any CLEC. (See, paragraphs 3(B) and 3(C) below, respectively.) A "line loss notification interruption" includes any of the following:

- (i) Missing LLNs, which includes any delay in transmission of mechanized LLN by SBC for more than four (4) business days from completion of work. The determination of whether a LLN was sent shall be calculated as provided in the Performance Measure Business Rules, including all exclusions, for PM MI 13.1, "Average Delay Days for Mechanized Line Loss Notifications."
- (ii) Inaccurate line loss notifications, which includes LLNs that were transmitted but contained either inaccurate or missing required data, such as conversion dates or affected telephone numbers.
- (iii) Improperly formatted LLNs, which include LLNs transmitted in a format other than expected (e.g., missing fields).
- (iv) Systemic transmission of LLNs in a mode, either an EDI 836 transaction, LEX GUI, or fax, that does not match the LLN mode contained in the CLEC's profile for LLNs. This excludes LLNs manually generated proactively by SBC.

Note: Any issues arising from a mix up in LSOR versions will be accounted for within this process, but dependent upon the particular situation, may vary as to which of the above categories this issue fits into.

#### **B. LLN Accessible Letters**

In its October 30 Filing, SBC proposed a plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002 that include an initial notification upon identification and then a follow-up notification upon resolution for line loss issues that affect more than one CLEC. Accessible Letter CLECAM02-122 issued November 12, 2002, is an example of an initial notification to CLECs of a line loss notifier interruption. CLECAM02-123 issued November 13, 2002 was then issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.



## **Line Loss Notifier Communications Plan**

In response to the January 13 Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

- Within one business day<sup>2</sup> of SBC determining that a line loss notification interruption has occurred, as defined above in paragraph 3(A), that could affect more than one CLEC, SBC will issue an Accessible Letter (“AL”) to all CLECs in the Midwest region. The AL will include any details available at the time of issuance, that SBC has confirmed to be accurate and complete, concerning the cause, scope and duration of the LLN issue.
- Within 1 business day of SBC identifying the affected CLECs, SBC (Account Teams and/or OSS Managers) will contact those affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support organization. Each situation varies in complexity and so the timeframe, as to when the affected CLECs will be identified, cannot be further defined.
- Because SBC will act as soon as there is a reasonable indication of a line loss issuance incident, the initial AL may not contain complete information. As soon as such information can be determined and confirmed, SBC will issue follow-up AL(s) and contact affected CLECs as needed with CLEC-specific information. Upon resolution of the issue, a final follow-up AL will be provided to all CLECs in the Midwest region.
- If SBC changes its line loss notifier procedures, including those contained in this plan, it shall immediately provide appropriate notification. Notification will be provided for any change to the procedures for delivering the actual line loss notification that would affect the format, data content, delivery method (other than normal changes via established processes, such as a new CLEC profile), or criteria for issuance of line loss notification transactions. Such notification will be provided in the manner defined by Change Management Process (“CMP”) guidelines, including the communications improvements noted in a separate plan filed simultaneously with this one. Where notification is appropriate but not covered by CMP, an AL will be issued.
- SBC commits to continuation of its cross-functional team that supports the “safety net” process for the review and evaluation of timely and accurate LLN issuance. SBC will evaluate the need for continuation at the end of the MPSC’s required reporting period and provide the MPSC with a 30-day notice of any discontinuance.

### **C. Monthly Reporting to the MPSC**

SBC will provide monthly reports to the MPSC regarding line loss issues for a minimum period of six months after the MPSC approves this plan. Reporting began with the activity for the calendar month of January 2003. The reports will be due by the 10th day of the following month.

The report will include information regarding line loss issues that have been identified by SBC during the reported calendar month; their cause, duration, scope of loss notifiers affected, number of LLNs affected (including both region-wide and state specific numbers where available), number of providers

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<sup>2</sup> The MPSC Order notes that these accessible letters should be sent “within 24 hours of determining that an interruption of line loss notification issuance has occurred ..” This plan proposes that such letter be sent within one business day to conform to SBC’s operational schedule and to be consistent with PM MI 13.

## **Line Loss Notifier Communications Plan**

affected, and actions taken to address the issues.<sup>3</sup> Providing a comparison to the total number of LLNs sent for the reporting month is not possible within the current stated reporting timeframe. The total numbers of all LLNs sent during the reporting month would not yet be available on the 10<sup>th</sup> of the next month. As a result, SBC will provide an average of the total number of LLNs sent during the three month period prior to the month of reporting, at both a regional and state level. This will allow the MPSC to compare the number of LLNs reported for that month, as a percentage of the total number of LLNs sent out by SBC on a total average monthly basis. Additionally, any referenced accessible letters will be provided with the report.

Further, if an identified issue has not reached resolution during the calendar month identified, it will be repeated in subsequent month(s) until resolved so that all required information is known and can be reported.

SBC will use the definition of line loss notification interruption provided in section 3(A) above when determining what should be included in the report.

The monthly report for February 2003 was filed on March 10, 2003; note the inclusion of information regarding cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. The report for March 2003, to be filed on April 10, 2003, will provide the additional data identified above.

## **4. Status Reporting**

SBC will file its monthly line loss issues report with the MPSC on the 10<sup>th</sup> of the following month, for a minimum of six months following the MPSC approval of the plan, with service on the parties of record for MPSC Case No. U-12320.

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<sup>3</sup> Per the January 13 Order, page 6.



**MPSC Case No. U-12320**

**Draft Improvement Plan**

**for**

**Line Loss Notifier Communications s Plan**

**February 13, 2003**

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ment Plan For Line Loss Notifier Communication

March 13, 2003

## Line Loss Notifier Communications Plan

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# 1. Purpose

The purpose of this ~~draft improvement~~ plan is to describe action Michigan Bell Telephone Company (“SBC”) has taken and will take to improve communications regarding line loss ~~noticers~~notifiers (“LLNs”). This ~~improvement~~ plan was first filed on October 30, 2002 (“October 30 ~~Compliance~~ Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan ~~has been revised to address was revised and filed on February 13, 2003 as a draft. The February 13 draft addressed~~ the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding operational concerns with ~~LLNs.~~LLNs and monthly reporting to the MPSC regarding such line loss issues for a minimum period of six months. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

Specifically, this plan details the ~~accessible letter~~communications process that will be used when SBC determines that an interruption of LLNs could affect more than one ~~CLEC.~~CLEC (though this scenario is also covered). It also describes the monthly report that SBC ~~proposes to will~~ provide to the MPSC for at least six ~~months.~~<sup>+</sup> ~~SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4—5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003.~~

months following approval of the plan by the MPSC.<sup>2</sup>

## 2. Issue

### 2.Issue

~~BearingPoint Consulting~~BearingPoint, Inc. (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems (“OSS”) testing. Two types of tests were performed: one using Test CLEC transactions that tested

<sup>+</sup> ~~This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13 are included with the January 17, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six month review.~~

<sup>2</sup> This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13, and the creation of an additional measure MI 13.1, were approved by the MPSC on February 20, 2002 in Case No. U-11830 and will be implemented for March 2003 results, reported in April 2003.

the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). Both of these tests initially resulted in the issuance of Exceptions (74 and 94), however each test was concluded satisfactorily through subsequent retesting by BearingPoint.

In its October 14, 2002 Disposition Report for Exception 74 regarding Test CLEC line loss testing, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.2% success rate, “the issues identified in this Exception Report have been addressed.” This finding, coupled with BearingPoint’s test results associated with Exception 94 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs.

CLECs. BearingPoint’s line loss test results are contained in its October 30, 2001 Michigan OSS Evaluation Project Report as TVV4-28 (accuracy) and TVV4-29 (timeliness) at pp. 935-936.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Compliance Filing, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held on October 14 - 18, 2003. Based on subsequent CLEC comments regarding that plan and plan, the MPSC’s direction in its January 13 Order, and the aforementioned Collaborative activity in March 2003, SBC has enhanced that plan.

### 3. Actions

#### A. Definition of Line Loss Notification Interruption

A “line loss notification interruption” would require the issuance of an accessible letter to all CLECs in the Midwest region, if it affected more than one CLEC. The “line loss notification interruption”, which includes any winback situations, would be included in the monthly report filed with the MPSC if it affected any CLEC. (See, paragraphs 3(B) and 3(C) below, respectively.) A “line loss notification interruption” includes any of the following:

- (i) Missing LLNs, which includes any delay in transmission of mechanized LLN by SBC for more than four (4) business days from completion of work. The determination of whether a LLN was sent shall be calculated as provided in the Performance Measure Business Rules, including all exclusions, for PM MI 13.1, “Average Delay Days for Mechanized Line Loss Notifications.”
- (ii) Inaccurate line loss notifications, which includes LLNs that were transmitted but contained either inaccurate or missing required data, such as conversion dates or affected telephone numbers.

(iii) Improperly formatted LLNs, which include LLNs transmitted in a format other than expected (e.g., missing fields).

(iv) Systemic transmission of LLNs in a mode, either an EDI 836 transaction, LEX GUI, or fax, that does not match the LLN mode contained in the CLEC's profile for LLNs. This excludes LLNs manually generated proactively by SBC.

Note: Any issues arising from a mix up in LSOR versions will be accounted for within this process, but dependent upon the particular situation, may vary as to which of the above categories this issue fits into.

## **B. LLN Accessible Letters**

In its October 30 ~~Compliance Plan filing~~, Filing, SBC proposed an ~~improvement~~ plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002. ~~The attached Accessible Letter, 2002 that include an initial notification upon identification and then a follow-up notification upon resolution for line loss issues that affect more than one CLEC. Accessible Letter~~ CLECAMS02-122 issued November 12, 2002, is ~~the single~~ an example ~~at this time~~ of an initial notification to CLECs of a line loss notifier interruption. ~~Also attached is~~ CLECAMS02-123 issued November 13, 2002, ~~which was~~ 2002 was then issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.

In response to the January 13 Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

~~—•~~ Within one business day<sup>3</sup> of SBC determining that an interruption of line loss notification issuance ~~interruption has occurred, as defined above in paragraph 3(A), that could affect more than one CLEC~~ ~~has occurred<sup>4</sup>~~, SBC will issue an Accessible

<sup>3</sup> The MPSC Order notes that these accessible letters should be sent "within 24 hours of determining that an interruption of line loss notification issuance has occurred .." This plan proposes that such letter be sent within one business day to conform to SBC's operational schedule and to be consistent with PM MI 13.

<sup>4</sup> ~~See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 33, ¶ 75, regarding how SBC will determine which outages will be reported. The MPSC Order notes that these accessible letters should be sent "within 24 hours of determining that an interruption of line loss notification issuance has occurred .."~~



Letter (“AL”) to ~~affected CLECs~~all CLECs in the Midwest region. The AL will include any details available at the time of issuance, details that SBC has confirmed to be accurate and complete, concerning the cause, scope and duration of the ~~interruption~~LLN issue.

~~Immediately following issuance of the AL, SBC will contact~~Within 1 business day of SBC identifying the affected CLECs, SBC (Account Teams and/or OSS Managers) will contact those affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support ~~organization~~.

- organization. Each situation varies in complexity and so the timeframe, as to when the affected CLECs will be identified, cannot be further defined.

~~Because SBC will act as soon as there is a reasonable indication of a line loss issuance incident, the initial AL may not contain complete information. As soon as such information can be determined and confirmed, SBC will issue follow-up ALs to~~AL(s) and contact affected CLECs.

- CLECs as needed with CLEC-specific information. Upon resolution of the issue, a final follow-up AL will be provided to all CLECs in the Midwest region.

~~If SBC changes its line loss notifier procedures, including those contained in this plan, it shall immediately provide appropriate~~ ~~notification~~.

- notification. Notification will be provided for any change to the procedures for delivering the actual line loss notification that would affect the format, data content, delivery method (other than normal changes via established processes, such as a new CLEC profile), or criteria for issuance of line loss notification transactions. Such notification will be provided in the manner defined by Change Management Process (“CMP”) guidelines, including the communications improvements noted in a separate plan filed simultaneously with this one. Where notification is appropriate but not covered by CMP, an AL will be issued.

- SBC commits to continuation of its cross-functional team that supports the “safety net” process for the review and evaluation of timely and accurate LLN issuance. SBC will evaluate the need for continuation at the end of the MPSC’s required reporting period and provide the MPSC with a 30-day notice of any discontinuance.

### **B.C. Monthly Reporting to the MPSC**

SBC will provide monthly reports to the MPSC regarding line loss issues for a minimum period of six ~~months, beginning with reporting~~months after the MPSC approves this plan. Reporting began with the activity for the calendar month of January 2003. The reports will be due by the ~~15th~~10th day of the following month.

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~~This plan proposes that such letter be sent within one business day to conform to SBC’s operational schedule.~~

~~This~~The report will include information regarding line loss issues that have ~~developed~~been identified by SBC during the reported calendar month; their cause, duration, scope of loss notifiers affected, number of LLNs affected (including both region-wide and state specific numbers where available), number of providers affected, and actions ~~CLECs affected, and actions taken to address the issues.~~taken to address the issues.<sup>5</sup> Providing a comparison to the total number of LLNs sent for the reporting month is not possible within the current stated reporting timeframe. The total numbers of all LLNs sent during the reporting month would not yet be available on the 10<sup>th</sup> of the next month. As a result, SBC will provide an average of the total number of LLNs sent during the three month period prior to the month of reporting, at both a regional and state level. This will allow the MPSC to compare the number of LLNs reported for that month, as a percentage of the total number of LLNs sent out by SBC on a total average monthly basis. Additionally, any referenced accessible letters will be provided with the report.

Further, if an identified issue has not reached resolution during the calendar month identified, it will be repeated in subsequent month(s) until resolved so that all required information is known and can be reported.

SBC will use ~~a broad~~the definition of line loss ~~issues~~notification interruption provided in section 3(A) above when determining what should be included in the report.

~~•A sample of the proposed monthly report is included as an attachment to this plan. The format of this report may change based on the March 4 collaborative session.~~

The monthly report for February 2003 was filed on March 10, 2003; note the inclusion of information regarding cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. The report for March 2003, to be filed on April 10, 2003, will provide the additional data identified above.

## 4. Status Reporting

SBC will ~~report~~file its monthly line loss issues ~~monthly to the MPSC~~report with the MPSC on the 10<sup>th</sup> of the following month, for a minimum of six ~~months.~~

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<sup>5</sup> Per the January 13 Order, page 6.

months following the MPSC approval of the plan, with service on the parties of record for MPSC Case No. U-12320.



**MPSC Case No. U-12320**

**Pre-Order Processing Timeliness Plan**

**March 13, 2003**

# **Pre-Order Processing Timeliness Plan**

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## **Pre-Order Processing Timeliness Plan**

### **1. Purpose**

The purpose of this plan is to describe actions Michigan Bell Telephone Company (“SBC”) has taken and plans to take to improve pre-order processing timeliness. This plan was first filed on October 30, 2002 (“October 30 Compliance Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”) in Case No. U-12320 (“SBC’s §271 Checklist Compliance Docket”), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding pre-order transaction protocol conversion (i.e., EDI translation) timeliness. Specifically, the January 13 Order required that SBC’s filing include: validation that recent changes to its pre-order EDI translator software resulted in a decrease in translator processing time; details of any further plans in this area; and the status regarding Performance Measurement 2 relating to protocol conversion time. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

### **2. Issue Definition**

BearingPoint, Inc. (f/k/a KPMG Consulting) performed a Pre-Order, Order and Provisioning Volume Test as part of the Third-Party Operations Support Systems (“OSS”) testing. Following each of the multiple iterations of that testing, BearingPoint issued various Observations and Exceptions regarding the results. These Observations and Exceptions were consolidated into Exception 112.

During the course of volume testing, SBC made system enhancements addressing the functional issues and timing issues identified by BearingPoint. These enhancements were retested by BearingPoint in subsequent volume test iterations. BearingPoint’s most recent analysis has confirmed that there are presently no unsatisfied determinations for the functionality evaluation criteria, and few issues with timeliness.

The timeliness of the EDI pre-order interface was the issue most consistently cited by BearingPoint during the course of its volume testing. Of the failed test points resulting from volume testing identified by BearingPoint in its report on the OSS Evaluation, virtually all are associated with pre-order transaction timeliness, and more with the timeliness of the EDI pre-order interface than with the CORBA or GUI interface<sup>1</sup>.

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<sup>1</sup> BearingPoint’s Pre-Order, Order, and Provisioning volume test consisted of forty-four test points. Thirty-three of these test points were considered as satisfied in

## Pre-Order Processing Timeliness Plan

Based on then-current performance results, and taking into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces rather than the EDI interface for pre-order inquiries, SBC believes its EDI pre-order performance satisfactory. However, in response to the interest of parties to this OSS evaluation, SBC has continued to examine alternatives to improve EDI pre-order timeliness.

### 3. Actions

#### A. Pre-order EDI translator improvement results.

In its October 30 Compliance Plan filing, SBC proposed a plan for pre-order timeliness. That plan described a configuration change that had been made to SBC's pre-order EDI translator and the expected performance from same, intended future translator software evaluations, and potential system upgrades.

During 3Q02, SBC and Sterling Commerce worked to determine whether it was possible to improve the performance of its Gentran EDI translation software. After initially concluding that no such performance improvement was possible, a custom modification to the software configuration was attempted. This custom modification effectively reduced the amount of system processing performed on each transaction. Testing confirmed the performance improvement and that there was no detrimental impact on process functionality. This software configuration change was then made to the production EDI translator on September 11, 2002<sup>2</sup>.

Data collected by SBC for monitoring EDI translator performance shows a significant improvement as a result of this September 11 software configuration change. These data are included as Attachment 1.<sup>3</sup> The average protocol translation time improved from 1.4 seconds inbound and 1.7 seconds outbound prior to the translator configuration change to

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the October 30 OSS Evaluation report. The test points not satisfied included timeliness of five individual EDI pre-order transaction types, timeliness of two individual GUI pre-order transaction types, timeliness of two individual CORBA pre-order transaction types, appropriateness of responses to GUI pre-order transactions, and timeliness of order reject transactions. See January 13, 2003 "Report of Michigan Public Service Commission" in Case No. U-12320 at pp. 61-63.

<sup>2</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had actually placed the modified translator configuration into production.

<sup>3</sup> MPSC January 13 Opinion and Order, pg. 5, requiring that SBC provide information to validate that the September 11, 2002 configuration change produced a decrease in translator processing time.

## Pre-Order Processing Timeliness Plan

.36 seconds inbound and .73 seconds outbound after the change; this can be seen in examining the data just before and just after implementation of the configuration change.

### **B. Pending Pre-order EDI translator improvement**

Further, SBC will upgrade the existing SBC commercial EDI translator to the most recent version of software, Gentran:Server 6.0, in 2Q2003. The configuration change, as outlined above, will be carried over to this upgraded version<sup>4</sup>.

Sterling Commerce released a completely new version of their EDI translator software in late 2002. This new version is referred to as Sterling Integrator. SBC is evaluating this new translator software, and considering implementation of the software.

During October 2002, the SBC EDI group examined the technical documentation, viewed product demonstrations, and held discussions with the Sterling Integrator development team. While there are a number of new application management features in the Integrator product, no obvious performance enhancements over the translator software configuration presently in use by SBC were identified at that time.

Subsequently, SBC's translator operating environment was replicated for Sterling so that they could perform comparison measurements in their labs<sup>5</sup>. On February 6, 2003, the Sterling technical team identified a potential way to further improve translator response time using Sterling Integrator. This solution, however, has limitations in its ability to handle multiple versions and trading partners. We are continuing investigation to determine if it is possible to realize the performance improvements while retaining necessary functionality.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
1. Implement translator configuration change.	9/11/02	9/11/02	Completed
2. Upgrade EDI translator to latest available version (Gentran:Server 6.0)	02/03/03	6/30/03	In progress
A. Install Gentran:Server 6.0 on test server			Completed

<sup>4</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether the 2003 software upgrade is compatible with other software in the translator configuration.

<sup>5</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had ordered the software upgrade.



## Pre-Order Processing Timeliness Plan

Task	Begin	End	Status
B. Upgrade operating system version on production translator	02/03/03	Ongoing	In progress
C. Install Gentran:Server 6.0 on production translator	02/03/03	Ongoing	In progress
3. Evaluate performance of Sterling Integrator	12/15/02	Ongoing	In progress

### **C. Status of Performance Measure 2**

As a means to monitor the future performance of the pre-order EDI translator, SBC had jointly proposed with CLECs, and the MPSC has approved, an immediate clarification and amendment to Performance Measure 2, Pre-Order Transaction Timeliness. In this clarification, the measurement of protocol conversion time is clearly defined. This modification to PM 2 is included with the January 17, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six-month review, which the MPSC approved on February 20, 2003. A copy of the modified PM2 is included as Attachment 2. The business rules now clearly define when and where the time stamps are to be taken for protocol translations and for the requested pre-order function. In addition a separate benchmark has been added for protocol translation for EDI, CORBA and WebVerigate. The modified PM2 will be implemented in March 2003 results, reported in April 2003.

Protocol Translation Time – EDI (input and output)	95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)	95% in <= 1 seconds

Protocol Translation Time – WebVerigate (input and output)	95% in <= 1 second diagnostic
--	----------------------------------

## **4. Status Reporting**

SBC will file a report regarding its progress on pending pre-order EDI translator improvement discussed in Section 3(b) above to the Commission for its review and serve the report upon the parties of record in MPSC Case No. U-12320 in July 2003 and quarterly thereafter, if needed. SBC will report protocol translation times in accordance with the terms of PM 2 effective with the schedule approved by the MPSC on February 20, 2003, which requires that protocol translation times for PM 2 be effective with March 2003 results, reported in April 2003.

## Pre-Order Processing Timeliness Plan

### EDI Protocol Translation Time (Pre-Order)

SENDER	LOG_DATE	IN_AVG	OUT_AVG	TRANS_COUNT	IN_SEC_TOT	OUT_SEC_TOT
EDI	20020901	0.976	1.748	1	0.976	1.748
EDI	20020903	1.451	1.617	1207	1751.52	1951.839
EDI	20020904	1.514	1.665	1164	1761.853	1937.84
EDI	20020905	1.474	1.658	775	1142.69	1285.139
EDI	20020906	1.469	1.603	751	1103.225	1203.565
EDI	20020907	1.346	1.445	20	26.927	28.907
EDI	20020909	1.472	1.646	1051	1546.858	1729.577
EDI	20020910	1.497	1.62	900	1346.923	1458.101
EDI	20020911	1.474	1.672	759	1119.057	1269.149
<b>Totals</b>				<b>6628</b>	<b>9800.029</b>	<b>10865.865</b>
				Avg IN =	1.478580115	
				Avg OUT=		1.639388202
EDI	20020912	0.344	0.569	814	279.847	463.402
EDI	20020913	0.342	0.549	982	335.503	539.067
EDI	20020914	0.347	0.671	47	16.3	31.537
EDI	20020915	0.353	0.759	36	12.691	27.34
EDI	20020916	0.361	0.693	2081	751.99	1442.01
EDI	20020917	0.383	0.706	1910	731.324	1347.946
EDI	20020918	0.347	0.749	2030	704.384	1520.846
EDI	20020919	0.349	0.717	1849	645.167	1325.398
EDI	20020920	0.345	0.738	1780	613.31	1312.95
EDI	20020921	0.349	0.61	68	23.726	41.507
EDI	20020922	0.372	0.613	35	13.02	21.441
EDI	20020923	0.343	0.692	2350	806.808	1626.588
EDI	20020924	0.359	0.782	3000	1078.345	2345.589
EDI	20020925	0.347	0.749	2053	712.898	1538.3
EDI	20020926	0.383	0.796	1956	748.237	1556.162
EDI	20020927	0.385	0.773	1829	703.929	1413.058
EDI	20020928	0.391	0.72	92	35.983	66.195
EDI	20020929	0.544	0.844	24	13.047	20.252
EDI	20020930	0.385	0.779	2965	1140.448	2309.75
<b>Totals</b>				<b>25901</b>	<b>9366.957</b>	<b>18949.338</b>
				Avg IN =	0.361644608	
				Avg OUT=		0.731606424

This table shows the time required for processing transactions through SBC Midwest's pre-order EDI translator. All LSOG 5 EDI pre-order transactions for the region are included.

Information is compiled from raw data captured from the EDI translator and has not been modified to be consistent with the expected reporting of this information

Dates are in the format of YYYYMMDD, times are in seconds.

## **Pre-Order Processing Timeliness Plan**

The following table provides data resulting from an analysis of EDI protocol timeliness for three recent months (December 2002 – February 2003) per the business rules for PM 2 as approved by the MPSC on February 20, 2003. Note that EDI timeliness has exceeded the benchmark established in the recently-updated PM 2 for all three months.

<b>Month</b>	<b>Count</b>	<b>EDI-IN</b>	<b>EDI-OUT</b>
December 2002	127925	99.48%	95.75%
January 2003	129536	99.37%	98.33%
February 2003	189805	99.45%	96.49%

## Pre-Order Processing Timeliness Plan

2. Percent Responses Received within “X” seconds – OSS Interfaces	
<b>Definition:</b>	
The percent of responses completed in “x” seconds for pre-order interfaces (WebVerigate, EDI and CORBA) by function.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"><li>• None</li></ul>	
<b>Business Rules:</b>	
<p>Timestamps for the interfaces (WebVerigate, EDI and CORBA) are taken at the SBC Pre-Order Adapter and do not include transmission time through the xRAF or protocol translation times. The clock starts on the date/time when the query is received by the SBC Pre-Order Adapter and stops at the date/time the SBC Pre-Order Adapter passes the response back to the interfacing application (WebVerigate, EDI pre-order or CORBA). The response time is measured only within the published hours of interface availability as posted on the CLEC On-line website.</p> <p><a href="https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS%20Hours%20of%20Operation.xls">https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS Hours of Operation.xls</a></p> <p>For the protocol translation response times, interface input times start at the time the interface receives the pre-order query request from the CLEC and the end time is when the connection is made to the SBC Pre-Order Adapter for processing. Interface output times start when the interface receives the response message back from SBC Pre-Order Adapter and the end time is when the message is sent to the CLEC.</p> <p>If the CLEC accesses SBC systems using a Service Bureau Provider, the measurement of SBC's performance does not include Service Bureau Provider processing, availability or response time.</p>	

## Pre-Order Processing Timeliness Plan

Levels of Disaggregation:						
<ul style="list-style-type: none"><li>• Address Verification</li><li>• Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)</li><li>• Customer Service Inquiry (CSI) &lt; = 30 WTNs (Also broken down for Lines as required for DIDs).</li><li>• Customer Service Inquiry (CSI) &gt; 30 WTNs/lines</li><li>• Service Availability</li><li>• Service Appointment Scheduling (Due Date)</li><li>• Dispatch Required</li><li>• PIC</li><li>• Actual Loop Makeup Information requested</li><li>• Design Loop Makeup Information requested (includes Pre-Qual transactions)</li><li>• Protocol translation time – EDI (includes input and output times)</li><li>• Protocol translation time – CORBA (includes input and output times)</li><li>• Protocol translation time – WebVerigate (includes input and output times)</li></ul>						
Calculation:			Report Structure:			
(# of responses within each time interval ÷ total responses) * 100			Reported for a CLEC, all CLECs, and SBC affiliate where applicable (or SBC acting on behalf of its' affiliate), by interface.			
Measurement Type:						
	IL	IN	MI	OH	WI	
Tier 1	Low	Low	Med	Low	Low	
Tier 2	Med	Med	Med	Med	Med	
Benchmark:						
No damages will apply to the Protocol Translation Times for WebVerigate. No damages apply to the disaggregation for CSIs with greater than 30 WTNs/lines. Critical z-value does not apply.						
Measurement				WebVerigate, EDI and CORBA		
Address Verification				95% in <= 10 seconds		
Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)				95% in <= 10 seconds		
Customer Service Inquiry < or = 30 WTNs/lines				95% in <= 15 seconds		
Customer Service Inquiry > 30 WTNs/lines				95% in <= 60 seconds diagnostic		

## Pre-Order Processing Timeliness Plan

Service Availability		95% in <= 13 seconds
Service Appointment Scheduling (Due Date)		95% in <= 5 seconds
Dispatch Required		95% in <= 19 seconds
PIC		95% in <= 25 seconds
Actual Loop Makeup Information requested (5 or less loops searched)		95% in <= 30 seconds
Actual Loop Makeup Information requested (greater than 5 loops searched)		95% in <= 60 seconds
Design Loop Makeup Information requested (includes Pre-Qual transactions)		95% in <= 15 seconds
Protocol Translation Time – EDI (input and output)		95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)		95% in <= 1 seconds
Protocol Translation Time – WebVerigate (input and output)		95% in <= 1 second diagnostic



**MPSC Case No. U-12320**

**Draft Improvement Plan**

**for**

**Pre-Order Processing Timeliness Plan**

**February 13, 2003**

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ment Plan For Pre-Order Processing Improvements

March 13, 2003

## Pre-Order Processing Timeliness Plan

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## Pre-Order Processing Timeliness Plan

### **1. Purpose**

The purpose of this ~~draft-improvement~~ plan is to describe actions Michigan Bell Telephone Company (“SBC”) has taken and plans to take to improve pre-order processing timeliness. This ~~improvement plan, plan was~~ first filed on October 30, 2002 (“October 30 Compliance Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”) in Case No. U-12320 (“SBC’s §271 Checklist Compliance Docket), the plan ~~has been revised to address~~ was revised and filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding pre-order transaction protocol conversion (i.e., EDI translation) timeliness. Specifically, the January 13 Order required that SBC’s filing include: validation that recent changes to its pre-order EDI translator software resulted in a decrease in translator processing time; details of any further ~~improvement~~ plans in this area; and the status regarding Performance Measurement 2 relating to protocol conversion time. SBC ~~recognizes that further modifications to this plan may be appropriate based on~~ further modified this plan based on input received during the collaborative session ~~scheduled for March 4–5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13,~~ held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

### **2. Issue Definition**

BearingPoint, Inc. (f/k/a KPMG Consulting) performed a Pre-Order, Order and Provisioning Volume Test as part of the Third-Party Operations Support Systems (“OSS”) testing. Following each of the multiple iterations of that testing, BearingPoint issued various Observations and Exceptions regarding the results. These Observations and Exceptions were consolidated into Exception 112.

During the course of volume testing, SBC made system enhancements addressing the functional issues and timing issues identified by BearingPoint. These enhancements were retested by BearingPoint in subsequent volume test iterations. BearingPoint’s most recent

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

analysis has confirmed that there are presently no unsatisfied determinations for the functionality evaluation criteria, and few issues with timeliness.

The timeliness of the EDI pre-order interface was the issue most consistently cited by BearingPoint during the course of its volume testing. Of the failed test points resulting from volume testing identified by BearingPoint in its report on the OSS Evaluation, virtually all are associated with pre-order transaction timeliness, and more with the timeliness of the EDI pre-order interface than with the CORBA or GUI interface<sup>1</sup>.

Based on then-current performance results, and taking into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces rather than the EDI interface for pre-order inquiries, SBC believes its EDI pre-order performance satisfactory. However, in response to the interest of parties to this OSS evaluation, SBC has continued to examine alternatives to improve EDI pre-order timeliness.

### 3. Actions

#### A. Pre-order EDI translator improvement results.

In its October 30 Compliance Plan filing, SBC proposed an ~~improvement~~ plan for pre-order timeliness. That plan described a configuration change that had been made to SBC's pre-order EDI translator and the expected performance ~~improvement~~ from same, intended future translator software evaluations, and potential system upgrades.

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<sup>1</sup> BearingPoint's Pre-Order, Order, and Provisioning volume test consisted of forty-four test points. Thirty-three of these test points were considered as satisfied in the October 30 OSS Evaluation report. The test points not satisfied included timeliness of five individual EDI pre-order transaction types, timeliness of two individual GUI pre-order transaction types, timeliness of two individual CORBA pre-order transaction types, appropriateness of responses to GUI pre-order transactions, and timeliness of order reject transactions. [See January 13, 2003 "Report of Michigan Public Service Commission" in Case No. U-12320 at pp. 61-63.](#)

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During 3Q02, SBC and Sterling Commerce worked to determine whether it was possible to improve the performance of its Gentran EDI translation software. After initially concluding that no such performance improvement was possible, a custom modification to the software configuration was attempted. This custom modification effectively reduced the amount of system processing performed on each transaction. Testing confirmed the performance improvement and that there was no detrimental impact on process functionality. This software configuration change was then made to the production EDI translator on September 11, 2002<sup>2</sup>.

Data collected by SBC for monitoring EDI translator performance shows a significant improvement as a result of this September 11 software configuration change. ~~This data is~~ These data are included as Attachment 1.<sup>3</sup> The average protocol translation time improved from 1.4 seconds inbound and 1.7 seconds outbound prior to the translator configuration change to .36 seconds inbound and .73 seconds outbound after the ~~change~~. change; this can be see in examining the data just before and just after implementation of the configuration change.

**B. Pending Pre-order EDI translator improvement**

Further, SBC will upgrade the existing SBC commercial EDI translator to the most recent version of software, Gentran:Server 6.0, in 2Q2003. The configuration change, as outlined above, will be carried over to this upgraded version<sup>4</sup>.

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<sup>2</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had actually placed the modified translator configuration into production.

<sup>3</sup> MPSC January 13 Opinion and Order, pg. 5, requiring that SBC provide information to validate that the September 11, 2002 configuration change produced a decrease in translator processing time.

<sup>4</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether the 2003 software upgrade is compatible with other software in the translator configuration.

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

Sterling Commerce released a completely new version of their EDI translator software in late 2002. This new version is referred to as Sterling Integrator. SBC is evaluating this new translator software, and considering implementation of the software.

During October 2002, the SBC EDI group examined the technical documentation, viewed product demonstrations, and held discussions with the Sterling Integrator development team. While there are a number of new application management features in the Integrator product, no obvious performance enhancements over the translator software configuration presently in use by SBC ~~could be identified. were identified at that time.~~

Subsequently, SBC's translator operating environment was replicated for Sterling so that they could perform comparison measurements in their labs<sup>5</sup>. ~~The~~On February 6, 2003, the Sterling technical ~~teams have not yet been able to suggest any improvements in SBC's current mode of operations or offer evidence that the Integrator software would have~~team identified a potential way to further improve translator response time using Sterling Integrator. This solution, however, has performance benefits, limitations in its ability to handle multiple versions and trading partners. We are continuing investigation to determine if it is possible to realize the performance improvements while retaining necessary functionality.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
1. Implement translator configuration change.	9/11/02	9/11/02	Completed
<del>2. Upgrade EDI translator to latest available version (Gentran:Server 6.0)</del>	<del>02/03/03</del>	<del>6/30/02</del>	<del>In progress</del>
<u>2. Upgrade EDI translator to latest available version (Gentran:Server 6.0)</u>	<u>02/03/03</u>	<u>6/30/03</u>	<u>In progress</u>
A. Install Gentran:Server 6.0 on test server			Completed

<sup>5</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had ordered the software upgrade.

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

Task	Begin	End	Status
B. Upgrade operating system version on production translator	02/03/03	Ongoing	In progress
C. Install Gentran:Server 6.0 on production translator	02/03/03	Ongoing	In progress
3. Evaluate performance of Sterling Integrator	12/15/02	Ongoing	In progress

**C. Status of Performance Measure 2**

As a means to monitor the future performance of the pre-order EDI translator, SBC ~~has had~~ jointly proposed with CLECs, and the MPSC has approved, an immediate clarification and amendment to Performance Measure 2, Pre-Order Transaction Timeliness. In this clarification, the measurement of protocol conversion time is clearly defined. This modification to PM 2 is included with the January 17, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six-month review, which the MPSC approved on February 20, 2003. A copy of the ~~proposed~~ modified PM2 is included as Attachment 2. The business rules now clearly define when and where the time stamps are to be taken for protocol translations and for the requested pre-order function. In addition a separate benchmark has been added for protocol translation for EDI, CORBA and WebVerigate. The modified PM2 will be implemented in March 2003 results, reported in April 2003.

Protocol Translation Time – EDI (input and output)	95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)	95% in <= 1 seconds

Protocol Translation Time – WebVerigate (input and output)	95% in <= 1 second diagnostic
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## 4. Status Reporting

SBC will provide file a report regarding its progress on pending pre-order EDI translator improvement discussed in Section 3(b) above to the Commission for its review and serve the report upon the parties of record in MPSC Case No. U-12320 in July 2003 and quarterly thereafter, if needed. SBC will ~~continue to~~ report protocol translation times in accordance with the terms of PM~~2~~.



~~*DISCUSSION DRAFT*~~ ~~2/6/03~~

~~**Draft Improvement Plan For Pre-Order Processing Improvements**~~  
~~Appendix 2—Proposed Performance Measure 2~~

~~**EDI Protocol**~~2 effective with the schedule approved by the MPSC on February 20, 2003, which requires that protocol translation times for PM 2 be effective with March 2003 results, reported in April 2003.

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

EDI Protocol Translation Time (Pre-Order)

SENDER	LOG_DATE	IN_AVG	OUT_AVG	TRANS_COUNT	IN_SEC_TOT	OUT_SEC_TOT
EDI	20020901	0.976	1.748	1	0.976	1.748
EDI	20020903	1.451	1.617	1207	1751.52	1951.839
EDI	20020904	1.514	1.665	1164	1761.853	1937.84
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EDI	20020906	1.469	1.603	751	1103.225	1203.565
EDI	20020907	1.346	1.445	20	26.927	28.907
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EDI	20020910	1.497	1.62	900	1346.923	1458.101
EDI	20020911	1.474	1.672	759	1119.057	1269.149
<b>Totals</b>				<b>6628</b>	<b>9800.029</b>	<b>10865.865</b>

Avg IN =	1.478580115
Avg OUT=	1.639388202

EDI	20020912	0.344	0.569	814	279.847	463.402
EDI	20020913	0.342	0.549	982	335.503	539.067
EDI	20020914	0.347	0.671	47	16.3	31.537
EDI	20020915	0.353	0.759	36	12.691	27.34
EDI	20020916	0.361	0.693	2081	751.99	1442.01
EDI	20020917	0.383	0.706	1910	731.324	1347.946
EDI	20020918	0.347	0.749	2030	704.384	1520.846
EDI	20020919	0.349	0.717	1849	645.167	1325.398
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EDI	20020923	0.343	0.692	2350	806.808	1626.588
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EDI	20020925	0.347	0.749	2053	712.898	1538.3
EDI	20020926	0.383	0.796	1956	748.237	1556.162
EDI	20020927	0.385	0.773	1829	703.929	1413.058
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EDI	20020929	0.544	0.844	24	13.047	20.252
EDI	20020930	0.385	0.779	2965	1140.448	2309.75
<b>Totals</b>				<b>25901</b>	<b>9366.957</b>	<b>18949.338</b>

Avg IN =	0.361644608
Avg OUT=	0.731606424

~~**Draft Improvement Plan For Pre-Order Processing Improvements**~~  
~~Appendix 2—Proposed Performance Measure 2~~

This table shows the time required for processing transactions through SBC Midwest's pre-order EDI translator. All LSOG 5 EDI pre-order transactions for the region are included.

Information is compiled from raw data captured from the EDI translator and has not been modified to be consistent with the expected reporting of this information

Dates are in the format of YYYYMMDD, times are in ~~seconds~~.

## Pre-Order Processing Timeliness Plan

seconds.

The following table provides data resulting from an analysis of EDI protocol timeliness for three recent months (December 2002 – February 2003) per the business rules for PM 2 as approved by the MPSC on February 20, 2003. Note that EDI timeliness has exceeded the benchmark established in the recently-updated PM 2 for all three months.

<u>Month</u>	<u>Count</u>	<u>EDI-IN</u>	<u>EDI-OUT</u>
<u>December 2002</u>	<u>127925</u>	<u>99.48%</u>	<u>95.75%</u>
<u>January 2003</u>	<u>129536</u>	<u>99.37%</u>	<u>98.33%</u>
<u>February 2003</u>	<u>189805</u>	<u>99.45%</u>	<u>96.49%</u>

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

2. Percent Responses Received within “X” seconds – OSS Interfaces
<b>Definition:</b>
The percent of responses completed in “x” seconds for pre-order interfaces (WebVerigate, EDI and CORBA) by function.
<b>Exclusions:</b>
<ul style="list-style-type: none"><li>• None</li></ul>
<b>Business Rules:</b>
<p>Timestamps for the interfaces (WebVerigate, EDI and CORBA) are taken at the SBC Pre-Order Adapter and do not include transmission time through the xRAF or protocol translation times. The clock starts on the date/time when the query is received by the SBC Pre-Order Adapter and stops at the date/time the SBC Pre-Order Adapter passes the response back to the interfacing application (WebVerigate, EDI pre-order or CORBA). The response time is measured only within the published hours of interface availability as posted on the CLEC On-line website.</p> <p><a href="https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS%20Hours%20of%20Operation.xls">https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS Hours of Operation.xls</a></p> <p>For the protocol translation response times, interface input times start at the time the interface receives the pre-order query request from the CLEC and the end time is when the connection is made to the SBC Pre-Order Adapter for processing. Interface output times start when the interface receives the response message back from SBC Pre-Order Adapter and the end time is when the message is sent to the CLEC.</p> <p>If the CLEC accesses SBC systems using a Service Bureau Provider, the measurement of SBC's performance does not include Service Bureau Provider processing, availability or response time.</p>

~~Draft Improvement Plan For Pre-Order Processing Improvements~~  
~~Appendix 2—Proposed Performance Measure 2~~

Levels of Disaggregation:						
<ul style="list-style-type: none"><li>• Address Verification</li><li>• Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)</li><li>• Customer Service Inquiry (CSI) &lt; = 30 WTNs (Also broken down for Lines as required for DIDs).</li><li>• Customer Service Inquiry (CSI) &gt; 30 WTNs/lines</li><li>• Service Availability</li><li>• Service Appointment Scheduling (Due Date)</li><li>• Dispatch Required</li><li>• PIC</li><li>• Actual Loop Makeup Information requested</li><li>• Design Loop Makeup Information requested (includes Pre-Qual transactions)</li><li>• Protocol translation time – EDI (includes input and output times)</li><li>• Protocol translation time – CORBA (includes input and output times)</li><li>• Protocol translation time – WebVerigate (includes input and output times)</li></ul>						
Calculation:			Report Structure:			
(# of responses within each time interval ÷ total responses) * 100			Reported for a CLEC, all CLECs, and SBC affiliate where applicable (or SBC acting on behalf of its' affiliate), by interface.			
Measurement Type:						
	IL	IN	MI	OH	WI	
Tier 1	Low	Low	Med	Low	Low	
Tier 2	Med	Med	Med	Med	Med	
Benchmark:						
No damages will apply to the Protocol Translation Times for WebVerigate. No damages apply to the disaggregation for CSIs with greater than 30 WTNs/lines. Critical z-value does not apply.						
Measurement				WebVerigate, EDI and CORBA		
Address Verification				95% in <= 10 seconds		
Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)				95% in <= 10 seconds		
Customer Service Inquiry < or = 30 WTNs/lines				95% in <= 15 seconds		
Customer Service Inquiry > 30 WTNs/lines				95% in <= 60 seconds diagnostic		

**Draft Improvement Plan For Pre-Order Processing Improvements**  
~~Appendix 2—Proposed Performance Measure 2~~

Service Availability		95% in <= 13 seconds
Service Appointment Scheduling (Due Date)		95% in <= 5 seconds
Dispatch Required		95% in <= 19 seconds
PIC		95% in <= 25 seconds
Actual Loop Makeup Information requested (5 or less loops searched)		95% in <= 30 seconds
Actual Loop Makeup Information requested (greater than 5 loops searched)		95% in <= 60 seconds
Design Loop Makeup Information requested (includes Pre-Qual transactions)		95% in <= 15 seconds
Protocol Translation Time – EDI (input and output)		95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)		95% in <= 1 seconds
Protocol Translation Time – WebVerigate (input and output)		95% in <= 1 second diagnostic



# **Change Management Communications Plan**

**March 13, 2003**



# Change Management Communications Plan

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# **Change Management Communications Plan**

## **1. Purpose**

The purpose of this plan is to describe action Michigan Bell Telephone Company (“SBC”) has taken and will take to improve its 13-State Change Management process of Operational Support Systems (CMP). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding certain aspects of SBC’s management of the CMP processes. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

This change management communications plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC.

## **2. Issue Definition**

SBC has developed, in collaboration with CLECs, and implemented a uniform change management process – the 13 State Change Management Process (“13-State CMP”) pursuant to the FCC’s required Uniform and Enhanced Plan of Record (“POR”). The MPSC concluded in its report on SBC’s §271 Application that “SBC’s 13-State CMP complies with the FCC’s requirements and that the testing [performed by an independent third party auditor BearingPoint (formerly KPMG Consulting LLP)] indicates SBC’s compliance with that process.” (January 13 Order, p.10)

However, the MPSC did determine that certain recent OSS changes were implemented without prior announcement and did negatively affect CLECs. The MPSC further determined that “[a]lthough . . . SBC did comply with the letter of its change management process . . . a more encompassing definition of items covered by the exception process is necessary”. (January 13 Order, p. 10; See also “Report of the Michigan Public Service Commission” dated January 13, 2003, at p. 76, finding that SBC should “...propose a more comprehensive means for inclusion of items in the exceptions portion of its change management processes.”) With this plan, SBC proposes changes to

## Change Management Communications Plan

its procedures regarding notification of OSS modifications responsive to CLEC feedback<sup>1</sup> and the MPSC's requirements.

Pursuant to the Federal Communication Commission's ("FCC's") SBC/Ameritech Merger Condition 8, SBC developed and offered to the state commissions a uniform change management process – 13 State CMP. It was developed with significant Competitive Local Exchange Carriers ("CLEC") collaboration and negotiations. SBC implemented the 13-State CMP process in early 2001. This CMP was also reflected in the *Joint Report of the Participants Regarding Resolved OSS Enhancements And Process Improvements*, filed by the collaborative participants in this proceeding on December 27, 2000.

BearingPoint, Inc. ("BearingPoint") conducted an exhaustive and comprehensive test of SBC's change management methods and procedures. BearingPoint found that the 13-State CMP being used by SBC provides for input from interested parties and contains clearly defined and reasonable intervals for notifying CLECs about proposed changes. BearingPoint also found that the 13-State CMP is clearly defined and documented and that related documents are accessible via CLEC OnLine. Finally, as part of the assessment of the 13-State CMP documentation, BearingPoint reviewed detailed procedures for dispute resolution.

The 13-State CMP provides guidelines for the management of changes to the OSS interfaces provided by SBC and used by CLECs in the various SBC operating regions. For example, the 13-State CMP specifies timelines to guide the development and publishing by SBC of interface specifications for periodic, scheduled "releases", or enhanced versions of the interfaces.

In addition, in order that parties may manage the modifications required between releases, the 13-State CMP provides a process for notification of these changes referred to as the Exception process. A notification to CLECs is required under the Exception process whenever a change is to be implemented by SBC will have an impact on CLECs using the interface due to a change in interface business rules that occurs outside of the quarterly release requirements Accessible Letters ("ALs"). In a specific instance described by AT&T and noted by the MPSC, SBC did not issue an Exception notification of a planned change generally due to SBC's belief there would be no impact on CLECs.

This plan will facilitate communicating system changes that occur between releases and, more specifically, for the types of changes that were the basis for the comments filed by AT&T and noted by the MPSC.

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<sup>1</sup> See: AT&T Comments filed 11/15/02, Willard-Webber affidavit, pp. 35-37, ¶¶ 69-73; and, AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 23-32, ¶¶ 49-71.

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Certain changes made to SBC Midwest's OSS were implemented without announcement to the CLEC community. These changes resulted in the following error codes being encountered and were the basis for the AT&T comments:

- Error G408 (a. Invalid Trailing Data for Call Forward Busy No Answer Feature and b. Pay Per Use blocking and Custom ring feature)<sup>2</sup>
- Error L100/L101 (PIC/LPIC Change)<sup>3</sup>
- Error B103 (Additional Directory Listings issue for non- published accounts)<sup>4</sup>

### 3. Root Cause Analysis

At the time that each of the above errors occurred, SBC conducted an analysis to determine the cause. Only one of the above changes, L100/101 PIC/LPIC, should have followed the Exception Process as noted in the 13-State CMP. The Exception Process is invoked in those situations where SBC needs CLEC approval to modify an existing documented business rule outside of the normal notification timelines. In such a situation, SBC would distribute an Accessible Letter ("AL"), detailing the issue and requesting CLEC concurrence with the change/modification. For the L100/101 PIC/LPIC error, SBC applied an LSOG 5 edit in the LSOG 4 version in an attempt to correct an open Defect Report ("DR") related to flow through improvement. Since the business rule was changed for version 4.02, based on the Exception Process requirements, an Exception Request AL should have been distributed to CLECs. SBC is taking corrective actions to minimize the chance of this type of mistake reoccurring, as explained below.

In the case of both G408 and B103 errors, SBC was not *changing* any business rules, but either *creating an edit to enforce an existing rule*, or further *tightening an edit of an existing business rule*. SBC acknowledges that notifying CLECs of these types of modifications is beneficial. Accordingly, SBC will adopt a more encompassing definition of items covered by the exceptions process in the 13-State CMP and institute procedures to send Exception Request Accessible Letters to alert CLECs of any new edits that will be implemented in support of existing business rules. SBC will also enhance its Defect Report to provide more information to CLECs regarding modifications to existing edits in support of existing business rules that will be implemented in support of an open CLEC-impacting DR.

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<sup>2</sup> AT&T Comments filed 11/15/02, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58

<sup>3</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>4</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, p. 32, ¶¶ 70-71

## Change Management Communications Plan

Additionally, SBC recognizes that CLECs may appreciate additional information about SBC's third party vendors and software being used by SBC Midwest. SBC will provide these details to the CLEC community to further augment current communication and understanding of SBC Midwest OSS that may impact CLECs.

### 4. Actions

SBC is committed to implementing the following action plans. The actions listed below are in addition to the existing notification and communication process within the 13-State CMP and are intended to address CLEC-impacting changes that are made outside of the normal quarterly release cycles.<sup>5</sup> For purposes of correcting defects, CLEC-impacting is defined as any change made by SBC to the interface that would cause a CLEC's previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail.

#### a. New Edits for Existing Business Rules (Pre-Order and Order)

- SBC will notify the CLEC community via an Accessible Letter when *new edits* to existing business rules are developed and implemented for the pre-order and order interfaces.<sup>6</sup> For the purpose of this plan, SBC differentiates between types of new edits.
  - For *new edits initiated by SBC* ("proactive new edit") in support of an existing business rule, SBC will issue an Exception Request AL commensurate with the 13-State CMP. SBC proposes that the Accessible Letter will be distributed 5-7 days prior to SBC's implementation. SBC will hold a conference call to discuss the edit and the implementation date.
  - For *new edits in response to a CLEC-impacting defect*, SBC will issue an Exception Request AL with the turn around time commensurate with the severity

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<sup>5</sup> SBC will continue to follow 6.2 of the 13-state Change Management Plan for Severity-1 defects, which are defined as major software problems, production system failure or an interface failure, including significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

<sup>6</sup> Per the MPSC approved business rules, the Exception Process is excluded from performance measure MI 15; thus, the changes delineated herein will not be subject to PMs. Any changes to performance measures should be addressed in the six month reviews.

## **Change Management Communications Plan**

of the defect being corrected. SBC will host a conference call to discuss the edit and the implementation date.

- SBC will implement these changes effective April 21, 2003.

### **b. Modifications to Existing Edits for Existing Business Rules (Pre - Order and Order)**

- SBC will notify the CLEC community via the Defect Report when *modifications to existing edits and/or table updates* are required to correct an open defect in the pre-order and order interfaces. The Defect Report will be updated as CLEC-impacting defects are identified by either SBC or CLECs. Status will also be provided when the fixes have been implemented. This information will stay on the report for one week after the defect has been fixed. SBC will implement this change effective April 18, 2003.
- SBC will make the following enhancements to the current DR report for the Pre-Order and Order Interfaces only:
  - DR report will be updated and posted to CLEC On-line by 5pm Pacific each business day.
  - DR Report will now include details regarding fixes that require modifications to existing edits and/or table updates.
  - DR Report will list open CLEC-impacting DRs, a target date for a maintenance release once one is targeted for the specific DR, completed DRs, and identify which DRs were not completed in the maintenance release for which they were targeted.
- Beginning with the posting of the enhanced DR report on April 18, 2003, and then on each Monday thereafter through the end of May, 2003, SBC will issue an AL reminding CLECs to refer to the DR report for possible maintenance defects. The AL will indicate if new postings have been made to the DR report since the prior week's AL. The issue of how DR notifications will be handled will be discussed and agreed upon in the 13-state CMP meeting to be held on March 20, 2003.
- At each CMP meeting, SBC will update the CLECs on recent activity and progress of the defect requests impacting the pre-order and ordering interfaces.

### **c. EDI Mapping and CORBA IDL Changes**

SBC will send an Exception Request Accessible Letters for any EDI mapping or CORBA IDL structure changes that are identified as part of a defect.

## **Change Management Communications Plan**

### **d. Third Party Information to be Provided by SBC to CLECs**

SBC will provide CLECs with a list of SBC's 3<sup>rd</sup> party vendors and software versions used by OSS that could impact CLEC connectivity. SBC will provide more detailed information in ALs to include when SBC changes a 3<sup>rd</sup> party vendor or when SBC changes to a newer version of the 3<sup>rd</sup> party software.

### **e. CLEC Profile**

SBC will continue to work with CLECs in the CLEC User Forum on additional improvements to the CLEC Profile process.

### **f. Current Defect Testing**

SBC's Information Technology testing for Maintenance releases consists of:

- Positive Testing - testing of the specific issue/defect that has been identified. Recreation of the events that led to defect are repeated to validate the fix has corrected the specific issues or problem identified.
- Regression Testing - testing performed to ensure the change/fix associated with a given defect has no adverse impact.

Accountability will be mandated for all staff and management that participate in the testing of fixes. The Industry Markets organization will review the IT testing process to ensure thorough testing is performed. SBC has begun to develop and enforce a more stringent audit trail for these changes. This audit trail will improve the comprehensive, accurate, and timely creation and maintenance of testing documentation. At a minimum, the following rigors will be implemented:

- Test plans, scenarios, and expected outcomes will be reviewed and approved by IT management.
- Testing results (including re-testing) as documented by the IT testing team will be reviewed by Industry Markets prior to implementation to production.
- SBC will reinforce the criticality of rigorous testing and also educate the OSS Application Support teams and Industry Markets on these accountability/audit requirements.

### **g. Internal Training and Awareness Sessions**

- An internal informative document including the following items will be provided to the OSS Application teams:

## Change Management Communications Plan

- Guidance regarding how to improve system change evaluations made between releases;
  - Review of the types of changes (i.e. modifications to existing edits) that must be posted online;
  - Introduction to the enhanced DR report, its new required details (as outlined above) and procedures for posting and maintaining the report;
  - Overview of the purpose of the Exception Process and when to invoke it;
  - Clarification that new edits to existing business rules are now subject to follow the Exception Process; and
  - Overview of the importance of adhering to the 13-State CMP when making changes to business rules and system requirements.
- This internal informative document further clarifies which system changes may impact the CLECs. The document will focus on improving the existing evaluation process for system changes between quarterly releases. SBC will communicate this document to the OSS Support and System Application teams (including: OSS Customer Support, OSS Design and Support, CLEC Forums and Regulatory Support, and Information Technology teams) who are responsible for the execution of this plan.
  - SBC recognizes that edits which change/modify an existing LSOR business rule should go through the 13-State CMP including the Exception Process. SBC will re-emphasize the importance of thorough analysis of the existing LSOR and LSPOR to minimize the times an edit change from one version is inadvertently carried over to other versions. The L100/L101 error (PIC/LPIC Change) cited by AT&T was the result of modifying an existing document business rule.<sup>7</sup>
  - SBC will reinforce the need to use proper outage notification process for situations where a system does not turn up as planned. The H325 error (More Telephone Numbers than on Account is the example) was a result of a system not coming up as planned.<sup>8</sup> In the future, these failed turn ups will be handled through the normal outage notification process. For planned outages, SBC will continue to communicate to the CLEC community using the existing maintenance window schedule process.

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<sup>7</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>8</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 31-32, ¶¶ 68-69



## Change Management Communications Plan

### h. Quality Assurance Review Program

SBC will develop and implement an internal quality assurance review program to verify completeness and accuracy of the implementation of the action plans. Specifically, SBC will implement the following items:

- SBC management has reviewed and approved the above described action plans so that the action plan elements are integrated into daily operations and management.
- SBC will design and conduct a quality assurance review to monitor adherence to the action plan objectives. A “Quality Assurance Review Program” will be documented. It will provide the detailed methods and procedures for conducting the quarterly quality reviews. The review program will include sampling procedures for each of the changes made between releases and action plans listed above.
- Reviews will be conducted on a quarterly basis for one year. The reviews will be performed according to the methods and procedures defined in the “Quality Assurance Review Program.” Work papers will be documented and maintained. At the completion of the review, the results will be documented and reported to business and executive management.
- Issues identified during quality assurance reviews will be documented, tracked and investigated. Corrective actions will be taken as warranted. All such issues will be reported to business and executive management.

The following table provides the schedule for the actions discussed in this section:

Task	Begin Date	End Date	Status
SBC develops informative document <ul style="list-style-type: none"><li>• Determine and assign lead</li><li>• Create informative document</li><li>• Determine communication method</li><li>• Management reviews and approves document</li></ul>	3/10/03	3/31/03	In progress
SBC communicates informative document to OSS Application teams.	4/1/03	4/18/03	-----
SBC implements plan details (as described above). <ul style="list-style-type: none"><li>• New edits follow Exception Process</li><li>• Edit modification are treated as DR</li><li>• EDI mapping/CORBA DLI structure changes follow Exception Process</li></ul>	4/21/03	4/21/03	-----
Enhanced DR Report is created and posted.	3/10/03	4/18/03	In progress
SBC develops M&Ps for rigorous testing	3/10/03	4/18/03	In progress

## Change Management Communications Plan

including additional audit trail requirements.			
Documentation templates to be used for audit trail during testing are developed and approved by IT and Industry Markets.	3/13/03	4/18/03	In progress
SBC provides list of 3 <sup>rd</sup> party vendors and software versions (as detailed above).	2/3/03	3/20/03	In progress
SBC designs quarterly quality assurance review program.	3/13/03	4/18/03	-----
SBC executes daily oversight and enforcement by local managers.	3/13/03	On going	-----
SBC executes quarterly assurance reviews.	4/30/03 <sup>9</sup>	On going	-----
SBC performs root cause analysis (if deviations were identified in quality reviews) <ul style="list-style-type: none"> <li>• Develop tracking process</li> <li>• Determine and assign resource(s)</li> <li>• Adopt corrective actions</li> <li>• Report results to management</li> </ul>	4/30/03	Ongoing	-----

### 5. Status Reporting

SBC will file a quarterly report regarding its progress on this plan to the MPSC for its review starting on April 30, 2003 for one year; SBC will serve a copy on the parties of record for MPSC Case No. U-12320. Specifically, with respect to actions 4(a), 4(b), and 4(c) SBC will initially confirm that it has implemented the described procedures. SBC will also provide a DR Report and a list of exception requests that have been communicated to CLEC during the period under review. With respect to action 4(d), SBC will confirm that it has provided the additional information. With respect to actions 4(e) and 4(f), SBC will initially summarize the status of the described documentation and training. With respect to action 4(g), SBC will provide summarized results on the quarterly quality assurance review programs. Where applicable, details on deviations and corresponding corrective actions will be provided. The processes discussed above will be brought before all CLECs in the 13-State Change Management Process for further discussion as some of these processes could have the effect of slowing down the implementation of fixes. Any agreed upon modifications will be provided to the MPSC.

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<sup>9</sup> Reflects beginning of first period to be reviewed; review periods are between quarterly releases.



**Draft Improvement Plan**

**For**

**Change Management Communications Plan**

**February 13, 2003**

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Change Management Communications Improvement Plan

**March 13, 2003**

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## Change Management Communications Plan

### **1. Purpose**

The purpose of this ~~draft improvement~~ plan is to describe ~~the actions~~action Michigan Bell Telephone Company ("SBC") ~~proposes to take to improve change management communications consistent with~~has taken and will take to improve its 13-State Change Management process of Operational Support Systems (CMP). Pursuant to the Michigan Public Service Commission ("MPSC") Opinion and Order datedCommission's ("MPSC's") Order issued January 13, 2003 ("January 13 Order"), in Case No. ~~U-12320 ("SBC's U-12320 (SBC's §271 Checklist Compliance Docket). The January 13 Order stated that certain recent OSS changes were implemented without prior announcement and did negatively affect CLECs and required SBC to include a compliance and/or improvement plan to address the issue. The change management communications~~Docket), the plan was filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding certain aspects of SBC's management of the improvement plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC. SBC recognizes that further modifications to this plan may be appropriate based on CMP processes. SBC further modified this plan based on input received during the collaborative session scheduled forheld at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. As a result, SBC will submit a modified improvement plan toAdditionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

This change management communications plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC.

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### **2. Issue Definition**

SBC has developed, in collaboration with CLECs, and implemented a uniform change management process – the 13 State Change Management Process ("13-State CMP") pursuant to the FCC's required Uniform and Enhanced Plan of Record ("POR"). The MPSC concluded in its report on SBC's §271 Application that "SBC's 13-State CMP complies with the FCC's requirements and that the testing [performed by an independent third party auditor BearingPoint (formerly KPMG Consulting LLP)] indicates SBC's compliance with that ~~process~~process." (January 13 Order, p.10)

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## Change Management Communications Plan

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- ~~Error H325 (More Telephone Numbers than on Account)~~<sup>5</sup>

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<sup>3</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>4</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, p. 32, ¶¶ 70-71

<sup>5</sup> ~~AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 31-32, ¶¶ 68-69~~



## Change Management Communications Plan

more beneficial and will encompass definition of items covered by the exceptions process in the 13-State CMP and institute procedures to send ~~courtesy~~ Exception Request Accessible Letters to alert CLECs of ~~these changes~~.

any new edits that will be implemented in support of existing business rules. SBC will also enhance its Defect Report to provide more information to CLECs regarding modifications to existing edits in support of existing business rules that will be implemented in support of an open CLEC-impacting DR.

Additionally, SBC recognizes that CLECs may appreciate additional information about SBC's third party vendors and software being used by SBC Midwest. SBC will provide these details to the CLEC community to further augment current communication and understanding of SBC Midwest OSS that may impact CLECs.

### **4. Actions**

SBC is committed to implementing the following action plans. The actions listed below are in addition to the existing notification and communication process within the 13-State ~~CMP~~.

CMP and are intended to address CLEC-impacting changes that are made outside of the normal quarterly release cycles.<sup>6</sup> For purposes of correcting defects, CLEC-impacting is defined as any change made by SBC to the interface that would cause a CLEC's previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail.

#### **a. New Edits for Existing Business Rules (Pre-Order and Order)** **a. ~~Additional Information to be Provided by SBC to CLECs~~**

- SBC will notify the CLEC community via ~~courtesy Accessible Letters~~ ("courtesy AL") ~~when changes to OSS are made that may reasonably be expected to be CLEC-impacting. Courtesy ALs will be communicated when the following change scenarios are implemented.~~ an Accessible Letter when *new edits* to existing business

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<sup>6</sup> SBC will continue to follow 6.2 of the 13-state Change Management Plan for Severity-1 defects, which are defined as major software problems, production system failure or an interface failure, including significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

## Change Management Communications Plan

rules are developed and implemented for the pre-order and order interfaces.<sup>7</sup> For the purpose of this plan, SBC differentiates between types of new edits.

~~1. CLECs would be notified with a courtesy Accessible Letter in situations where SBC is *tightening an edit or business rule*. SBC would include this type of change in a quarterly release if possible, but will evaluate each issue on a case-by-case basis. In situations where the change will occur outside a quarterly release (i.e., edit is part of a fix for an open DR), SBC intends to notify CLECs of the change through a courtesy AL. Notification of changes included in quarterly releases will continue to be provided in the Initial and Final Requirements Accessible Letters. Procedures to issue courtesy ALs will be developed and implemented. A specific example of this type of change is the G408 error (Invalid Trailing Data for Call Forward Busy No Answer Feature and Pay Per Use blocking and Custom ring feature) cited by AT&T.<sup>8</sup>~~

~~CLECs would be notified via a courtesy Accessible Letter in situations where SBC will *begin enforcing an existing documented business rule with an electronic or manual edit*. In situations where the change will occur outside a quarterly release, SBC will notify CLECs of the change through a courtesy Accessible Letter. Procedures to issue courtesy ALs will be developed and implemented. This action addresses the B103 error (Additional Directory Listings issue for non-published accounts), which impacted AT&T.<sup>9</sup> For new edits initiated by SBC ("proactive new edit") in support of an existing business rule, SBC will issue an Exception Request AL commensurate with the 13-State CMP. SBC proposes that the Accessible Letter will be distributed 5-7 days prior to SBC's implementation. SBC will hold a conference call to discuss the edit and the implementation date.~~

- ~~• For *new edits in response to a CLEC-impacting defect*, SBC will issue an Exception Request AL with the turn around time commensurate with the severity of the defect being corrected. SBC will host a conference call to discuss the edit and the implementation date.~~
- ~~• SBC will implement these changes effective April 21, 2003.~~

<sup>7</sup> Per the MPSC approved business rules, the Exception Process is excluded from performance measure MI 15; thus, the changes delineated herein will not be subject to PMs. Any changes to performance measures should be addressed in the six month reviews.

<sup>8</sup> AT&T Comments filed 11/15/02, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58.

<sup>9</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, p. 32, ¶¶ 70-71

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### b. Modifications to Existing Edits for Existing Business Rules (Pre-Order and Order)

- SBC will notify the CLEC community via the Defect Report when *modifications to existing edits and/or table updates* are required to correct an open defect in the pre-order and order interfaces. The Defect Report will be updated as CLEC-impacting defects are identified by either SBC or CLECs. Status will also be provided when the fixes have been implemented. This information will stay on the report for one week after the defect has been fixed. SBC will implement this change effective April 18, 2003.
- SBC will make the following enhancements to the current DR report for the Pre-Order and Order Interfaces only:
  - DR report will be updated and posted to CLEC On-line by 5pm Pacific each business day.
  - DR Report will now include details regarding fixes that require modifications to existing edits and/or table updates.
  - DR Report will list open CLEC-impacting DRs, a target date for a maintenance release once one is targeted for the specific DR, completed DRs, and identify which DRs were not completed in the maintenance release for which they were targeted.
- Beginning with the posting of the enhanced DR report on April 18, 2003, and then on each Monday thereafter through the end of May, 2003, SBC will issue an AL reminding CLECs to refer to the DR report for possible maintenance defects. The AL will indicate if new postings have been made to the DR report since the prior week's AL. The issue of how DR notifications will be handled will be discussed and agreed upon in the 13-state CMP meeting to be held on March 20, 2003.
- At each CMP meeting, SBC will update the CLECs on recent activity and progress of the defect requests impacting the pre-order and ordering interfaces.

### c. EDI Mapping and CORBA IDL Changes

SBC will send an Exception Request Accessible Letters for any EDI mapping or CORBA IDL structure changes that are identified as part of a defect.

### d. Third Party Information to be Provided by SBC to CLECs

? Additionally, SBC will provide CLECs with a list of SBC's 3<sup>d</sup> party vendors and software versions used by OSS that could impact CLEC connectivity. SBC will provide

## Change Management Communications Plan

more detailed information in Accessible Letters/ALs to include when SBC changes a 3<sup>rd</sup> party vendor or when SBC changes to a newer version of the 3<sup>rd</sup> party software.

### e. CLEC Profile

SBC will continue to work with CLECs in the CLEC User Forum on additional improvements to the CLEC Profile process.

### f. Current Defect Testing

SBC's Information Technology testing for Maintenance releases consists of:

- Positive Testing - testing of the specific issue/defect that has been identified. Recreation of the events that led to defect are repeated to validate the fix has corrected the specific issues or problem identified.
- Regression Testing - testing performed to ensure the change/fix associated with a given defect has no adverse impact.

Accountability will be mandated for all staff and management that participate in the testing of fixes. The Industry Markets organization will review the IT testing process to ensure thorough testing is performed. SBC has begun to develop and enforce a more stringent audit trail for these changes. This audit trail will improve the comprehensive, accurate, and timely creation and maintenance of testing documentation. At a minimum, the following rigors will be implemented:

- Test plans, scenarios, and expected outcomes will be reviewed and approved by IT management.
- Testing results (including re-testing) as documented by the IT testing team will be reviewed by Industry Markets prior to implementation to production.
- SBC will reinforce the criticality of rigorous testing and also educate the OSS Application Support teams and Industry Markets on these accountability/audit requirements.

### **g. Internal Training and Awareness Sessions**

- ~~SBC will reinforce and enhance the current communication with CLECs about system changes.~~ An internal informative document including the following items will ~~be~~ will be provided to the OSS Application teams:
  - ~~• Introduction and explanation of the purpose, function, and issuance procedures for courtesy ALs;~~
  - Guidance regarding how to improve system changes evaluations made between releases;

## Change Management Communications Plan

- Review of the types of changes (i.e. modifications to existing edits) that must be posted online;
  - Introduction to the enhanced DR report, its new required details (as outlined above) and procedures for posting and maintaining the report;
  - Overview of the purpose of the Exception Process and when to invoke it;
  - Clarification that new edits to existing business rules are now subject to follow the Exception Process; and
  - Overview of the importance of adhering to the 13-State CMP when making changes to business rules and system requirements.
- ~~SBC will develop an~~This internal informative document~~that~~ further clarifies which system changes may impact the CLECs. The document will focus on improving the existing evaluation process for system changes between quarterly releases. SBC will communicate this document to the OSS Support and System Application teams (including: OSS Customer Support, OSS Design and Support, CLEC Forums and Regulatory Support, and ~~FCC Merger and OSS Interconnection Support~~Information Technology teams) who are responsible for the execution of this ~~improvement plan.~~plan.
  - SBC recognizes that edits which change/modify an existing LSOR business rule should go through the 13-State CMP including the Exception Process. SBC will re-emphasize the importance of thorough analysis of the existing LSOR and LSPOR to minimize the times an edit change from one version is inadvertently carried over to other versions. The L100/L101 error (PIC/LPIC Change) cited by AT&T was the result of modifying an existing document business rule.<sup>10</sup>
  - SBC will reinforce the need to use proper outage notification process for situations where a system does not turn up as planned. The H325 error (More Telephone Numbers than on Account is the example) was a result of a system not coming up as planned.<sup>11</sup> In the future, these failed turn ups will be handled through the normal outage notification process. For planned outages, SBC will continue to communicate to the CLEC community using the existing maintenance window schedule process.

### **h. ~~C.~~—Quality Assurance Review Program**

SBC~~Midwest~~ will develop and implement an internal quality assurance review program to verify completeness and accuracy of the implementation of the action plans. Specifically, SBC~~Midwest~~ will implement the following items:

<sup>10</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>11</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 31-32, ¶¶ 68-69

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- SBC ~~Midwest management will review and approve~~management has reviewed and approved the above described action plans so that the action plan elements are integrated into daily operations and management.
- SBC~~Midwest~~ will design and conduct a quality assurance review to monitor adherence to the action plan objectives. A “Quality Assurance Review Program” will be documented. It will provide the detailed methods and procedures for conducting the quarterly quality reviews. The review program will include sampling procedures for each of the ~~error types~~changes made between releases and action plans listed above.
- Reviews will be conducted on a quarterly basis for ~~six months~~one year. The reviews will be performed according to the methods and procedures defined in the “Quality Assurance Review ~~Program~~”Program.” Work papers will be documented and maintained. At the completion of the review, the results will be documented and reported to business and executive management.
- Issues identified during quality assurance reviews(~~i.e. unannounced changes impacting CLEC(s)~~) will be documented, tracked and ~~investigated and corrective~~investigated. Corrective actions will be taken as warranted. All such issues will be reported to business and executive management.

The following table provides the schedule for the actions discussed in this section:

Task	Begin Date	End Date	Status
<del>SBC develops informative document</del> <ul style="list-style-type: none"><li><del>• Determine and assign lead</del></li><li><del>• Create informative document</del></li><li><del>• Determine communication method</del></li><li><del>• Management reviews and approves document</del></li></ul>	<u>2/13/03</u>	<u>3/13/03</u>	<u>In progress</u>
<u>SBC develops informative document</u> <ul style="list-style-type: none"><li><u>• Determine and assign lead</u></li><li><u>• Create informative document</u></li><li><u>• Determine communication method</u></li><li><u>• Management reviews and approves document</u></li></ul>	<u>3/10/03</u>	<u>3/31/03</u>	<u>In progress</u>
<del>SBC communicates informative document to OSS Application teams</del>	<u>4/13/03</u>	<u>3/15/03</u>	<u>In progress</u>
<u>SBC communicates informative document to OSS Application teams.</u>	<u>4/1/03</u>	<u>4/18/03</u>	<u>-----</u>
<del>SBC implements improvement plan details (as described above)</del> <ul style="list-style-type: none"><li><del>• Procedures to issue courtesy Accessible Letters are designed</del></li></ul>	<u>2/13/03</u>	<u>3/15/03</u>	<u>In progress</u>

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<del>• Procedures to issue courtesy Accessible Letters are implemented.</del>			
SBC implements plan details (as described above). • New edits follow Exception Process • Edit modification are treated as DR • EDI mapping/CORBA DLI structure changes follow Exception Process	<u>4/21/03</u>	<u>4/21/03</u>	<u>-----</u>
Enhanced DR Report is created and posted.	<u>3/10/03</u>	<u>4/18/03</u>	<u>In progress</u>
SBC develops M&Ps for rigorous testing including additional audit trail requirements.	<u>3/10/03</u>	<u>4/18/03</u>	<u>In progress</u>
Documentation templates to be used for audit trail during testing are developed and approved by IT and Industry Markets.	<u>3/13/03</u>	<u>4/18/03</u>	<u>In progress</u>
SBC provides list of 3 <sup>rd</sup> party vendors and software versions (as detailed above)	<u>2/3/03</u>	<u>3/20/03</u>	<u>In progress</u>
SBC provides list of 3 <sup>rd</sup> party vendors and software versions (as detailed above).	<u>2/3/03</u>	<u>3/20/03</u>	<u>In progress</u>
SBC designs quarterly quality assurance review program	<u>2/13/03</u>	<u>3/15/03</u>	<u>In progress</u>
SBC executes quality review • <del>Implement daily oversight</del> • <del>Implement quarterly reviews of DRs, CRs, and courtesy accessible letters (through sampling process)</del>	<u>3/13/03</u>	• <del>Daily Oversight: Ongoing</del> • <del>Quarterly: after each release for the next 2 releases</del>	<u>To be implemented</u>
SBC designs quarterly quality assurance review program.	<u>3/13/03</u>	<u>4/18/03</u>	<u>-----</u>
SBC executes daily oversight and enforcement by local managers.	<u>3/13/03</u>	<u>On going</u>	<u>-----</u>
SBC executes quarterly assurance reviews.	<u>4/30/03<sup>12</sup></u>	<u>On going</u>	<u>-----</u>
SBC performs root cause analysis (if deviations were identified in quality reviews) • <del>Develop tracking process</del> • <del>Determine and assign resource(s)</del> • <del>Adopt corrective actions</del> • <del>Report results to management</del>	<u>3/13/03</u>	<u>Ongoing</u>	<u>To be implemented</u>
SBC performs root cause analysis (if	<u>4/30/03</u>	<u>Ongoing</u>	<u>-----</u>

<sup>12</sup> Reflects beginning of first period to be reviewed; review periods are between quarterly releases.

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<u>deviations were identified in quality reviews)</u> <ul style="list-style-type: none"><li>• <u>Develop tracking process</u></li><li>• <u>Determine and assign resource(s)</u></li><li>• <u>Adopt corrective actions</u></li><li>• <u>Report results to management</u></li></ul>			
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### **5. Status Reporting**

SBC will ~~provide a file a quarterly~~ report regarding its progress on this ~~improvement~~ plan to the MPSC for its review ~~in April 2003 and in July 2003 and quarterly thereafter if needed.~~ starting on April 30, 2003 for one year; SBC will serve a copy on the parties of record for MPSC Case No. U-12320. Specifically, with respect to actions 4(a), 4(b), and 4(c) SBC will initially confirm that it has implemented the ~~Specifically, SBC will provide summarized results on the quarterly quality assurance review programs. Details on deviations and corresponding corrective actions will be provided.~~ described procedures. SBC will also provide a ~~list of courtesy Accessible Letters~~ DR Report and a list of exception requests that have been communicated to CLEC ~~within the quarter in review.~~ during the period under review. With respect to action 4(d), SBC will confirm that it has provided the additional information. With respect to actions 4(e) and 4(f), SBC will initially summarize the status of the described documentation and training. With respect to action 4(g), SBC will provide summarized results on the quarterly quality assurance review programs. Where applicable, details on deviations and corresponding corrective actions will be provided. The processes discussed above will be brought before all CLECs in the 13-State Change Management Process for further discussion as some of these processes could have the effect of slowing down the implementation of fixes. Any agreed upon modifications will be provided to the MPSC.





**MPSC Case No. U-12320**

**Bill Auditability and Dispute Resolution Plan**

**March 13, 2003**

# **Bill Auditability and Dispute Resolution Plan**

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## **Bill Auditability and Dispute Resolution Plan**

### **1. Purpose**

A number of CLECs raised issues relating to billing auditability and the billing dispute resolution process in their respective comments made or filed during November 2002. For the most part, the comments made were general in nature with few actionable specifics provided.<sup>1</sup> In its January 13, 2003 Order, the Michigan Public Service Commission (“MPSC”) required Michigan Bell Telephone Company (“SBC”) to “include in its February 13, 2003 filing an improvement or compliance plan to address these issues.” Based on the CLEC comments and information gathered from its account managers and other staff involved in providing support to CLECs, SBC understood the billing auditability issue to be difficulties in reconciling CABS billing statements and with utilizing SBC’s billing dispute resolution process when issues arise. SBC filed its draft on February 13, 2003 to address these concerns. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

This plan addresses the general bill auditability and dispute resolution process concerns that have been raised. Status on these actions will be monitored by SBC and filed with the MPSC, with service on the parties of record for MPSC Case No. U-12320. This plan does not address the CLEC-specific billing questions submitted. SBC has addressed those issues on an individual basis with the questioning CLEC and will continue to do so consistent with then existing processes and procedures.<sup>2</sup>

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<sup>1</sup> See Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters specifically comments of: TDS Metrocom (T5953) and ZTel T5961, T5967). Also, see XO Michigan, Inc’s November 5, 2002 Comments on Three Months of Ameritech Performance at p. 5.

<sup>2</sup> On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC. On February 25, 2003, SBC’s Account Team responded.

## **2. Issue Definition**

### **A. CABS Billing Auditability**

The billing auditability concerns appear to be focused on the Carrier Access Billing System (“CABS”). SBC Midwest implemented CABS BOS BDT<sup>3</sup> format billing for all UNE products in October 2001, consistent with the FCC’s Uniform and Enhanced OSS Plan of Record (the “POR”). The CLECs in general, and WorldCom in particular, were strong proponents of the move to CABS billing. As WorldCom stated, CABS billing “results in a highly dependable and auditable bill.”<sup>4</sup>

CABS is an industry standard format for billing that has been in use for years in the interexchange access business as well as by CLECs. These industry standards are defined by the Ordering and Billing Forum (“OBF”) which includes CLEC representation. As an OBF member, SBC adheres to the CABS billing requirements set by the OBF. This adherence ensures that all SBC Midwest CLEC customers receive a standard, non-discriminatory bill format which is documented and subject to an externally controlled change process. Accessible letters are issued to notify the CLECs of software changes to CABS; these notices include illustrative exhibits when appropriate.

SBC understands that not all CLECs may be conversant in reviewing their billing statements for auditing purposes. SBC CLEC Billing Workshops are available in each of the SBC regions to help CLECs read and interpret the CABS, LEC Services Billing (“LSB”), and Resale Billing System (“RBS”) bills received from SBC. This 1-1/2 day workshop includes information on identifying the components that make up the CABS, LSB and RBS bills as well as using Daily Usage Files (“DUF”) and Ameritech Electronic Billing System (“AEBS”) files. The workshop is available on an ongoing basis for scheduling; additional sessions can be added as needed based upon CLEC demand. Requests for any “on demand” courses are typically added to the schedule within a few weeks. In 2002, this Billing workshop was conducted seven times with 20 CLECs participating in one or more sessions.<sup>5</sup> Three workshops were cancelled due to no enrollment.

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<sup>3</sup> CABS BOS BDT stands for Carrier Access Billing System Billing Output Specifications Bill Data Tape, which is a guideline format overseen by the Ordering and Billing Forum, an industry organization that provides standard billing guidelines.

<sup>4</sup> Direct Testimony of A. Earl Hurter on Behalf of MCImetro Access Transmission Services, Inc. dated September 25, 2000, pg 5, line 12-13. Mr Hurter also indicates in his testimony that the CABS BOS format provides “efficient bill receipt, audit and payment is predicated on a predictable, well defined electronic bill format which allows for levels of summarization by end office, jurisdiction, LATA and state”. (pg 2, lines 17-19)

<sup>5</sup> Of the CLECs commenting on this issue, none participated in the available training in 2002.

## **Bill Auditability and Dispute Resolution Plan**

BearingPoint conducted extensive testing of SBC Midwest's CABS billing, evaluating the billing of recurring, non-recurring, and fractional charges as well as sums and cross totals on CABS bills. BearingPoint found that SBC exceeded the 95% benchmark for each of these categories. The BearingPoint Michigan OSS Evaluation Project Report issued on October 30, 2002 specifically evaluated recurring charges on UNE-P bills and determined that 98.9% of these charges were consistent with applicable tariff and/or contract. (See TVV9-6, at p. 1000.) Non-recurring and fractional rates on UNE-P bills were evaluated under TVV9-9 testing and the results indicated 99.2 % of the rates were consistent with applicable tariff and/or contracts. (See p. 1002)

### **B. Billing Dispute Resolution**

SBC's billing claims and adjustments process begins with the Local Service Center ("LSC") Claims/Dispute organization, which is responsible for processing CLEC billing claims and disputes. SBC's billing claim dispute resolution process is documented on CLEC Online and references the escalation procedures available to a CLEC dissatisfied with the disposition of its claim.<sup>6</sup> If the CLEC is still dissatisfied after the escalation process is complete, it can enter into the Informal Dispute Resolution ("IDR") process as outlined in the CLEC's interconnection agreement.<sup>7</sup> The IDR process generally begins with the Account Manager working with the CLEC to resolve the billing dispute, then notifying the LSC of the resolution. If the CLEC is still not satisfied with the resolution, escalation procedures are generally provided for in the IDR process to bring the issue to SBC senior management. A CLEC that does not have an interconnection agreement at the time of the billing dispute would also use its account manager to escalate and resolve billing disputes.

BearingPoint conducted comprehensive testing of SBC Midwest's support of CLEC billing related claims and inquiries. Testing included documentation reviews, interviews with SBC personnel and on-site observations of help desk operations. BearingPoint found that the billing support process clearly included procedures for accepting, acknowledging, investigating, tracking, and closing CLEC claims, issues, and inquiries. (See PPR10-3 through PPR10-5, pp. 668-671)

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<sup>6</sup> Go to <https://clec.sbc.com/clec>, click on CLEC Handbook, choose a state's handbook i.e. Michigan, and then select Billing from the menu provided on the left side of the screen.

<sup>7</sup> Go to <https://clec.sbc.com/clec>, click on Getting Started as a CLEC, choose Account Management Responsibilities, and then select Dispute Resolution under the General Responsibilities heading.

### **3. Actions**

#### **A. CABS Billing Auditability**

SBC will take the following actions to address the CLEC and MPSC concerns regarding billing auditability. When a CLEC raises a bill auditability issue, SBC will:

First, confirm that the CLEC is familiar with the support that is available -

- When contacted, SBC account managers will advise CLECs interested in modifications to the CABS BOS standards (e.g. call flows, interconnection agreement pricing schedules, tariff page references, additions) to submit their business need to the OBF.
- SBC Midwest Account Managers will remind their clients, as appropriate, of the ongoing availability and value in attending the SBC CLEC billing workshops. A general reminder also will be provided at the SBC CLEC User forum during or before April 2003.

Second, clarify with the CLEC the specifics of its concerns -

- Given the nonspecific nature of the Bill Auditability comments submitted by many of the CLECs, the issue will be added as an agenda item to the April 2003 SBC Midwest CLEC User Forum.
- At that forum, SBC will extend to the CLEC community, an invitation to schedule on an individual basis, a working session with SBC to discuss company specific billing auditability concerns.

Third, identify additional available support options -

- SBC will investigate the availability of bill auditability training sessions offered by external vendors and provide results of that investigation to the account managers and for CLEC Online updates. Initial evaluation will be completed by March 15, 2003, however SBC will continue to research other avenues and provide status at the April 2003 Midwest CLEC User Forum
- SBC will evaluate the need to develop a CABS billing overview presentation to be delivered during a SBC Midwest CLEC User forum. Initial evaluation will be completed by March 31, 2003.
- SBC will assess the viability of posting limited industry documentation on the CLEC Online website. Initial evaluation will be completed by March 15, 2003; SBC will provide status on findings at the April 2003 Midwest CLEC User Forum.
- SBC will develop a USOC reference guide which will map USOCs to the multi-state generic interconnection agreement and present this at the April 2003 SBC Midwest CLEC User Forum. On a going forward basis CLEC interconnection agreement USOC mapping requests should be provided to, and will be handled through, the specific CLEC's account manager.
- The review of the existing complement of CLEC workshops and Operation Support System classes is an ongoing activity. Participant feedback from the 2002 Billing

## **Bill Auditability and Dispute Resolution Plan**

Workshop sessions are considered in identifying course improvements. The review of the CLEC Billing Workshop, along with any related course material updates, will be completed by June 30, 2003.

- SBC will evaluate the feasibility of other training delivery methods. Evaluation will be completed by September 30, 2003.

### **B. Billing Dispute Resolution**

SBC will take the following actions to address the Dispute Resolution Process concerns raised.

The following actions will be taken to improve the CLECs' understanding of the billing dispute resolution process.

- Managers from the LSC's Claims/Dispute Resolution organization were scheduled to provide an overview of the claim submission process at the February 2003 SBC Midwest CLEC User Forum meeting. During that forum, the CLECs indicated they understood the claim process and preferred to discuss more specific bill dispute issues. A subcommittee, with representation from the various impacted SBC organizations and the CLECs, was created to address claims/dispute related issues; the subcommittee's first call took place on March 5, 2003. The subcommittee is expected to continue to meet periodically into the second quarter, with evaluation of continuation made at that time.
- When contacted, the Account Management teams will work with the LSC to schedule CLEC specific meetings to address their billing claim issues.

The following SBC internal training and documentation improvements will be implemented to improve the quality of the billing dispute resolution process.<sup>8</sup>

- The LSC Billing representative initial training course will be updated to address the gaps identified by the CLEC comments (i.e. stress process and communication with the CLEC, UNE-P product knowledge).
  - Classroom exercises will be incorporated to ensure sufficient practice occurs and mastery testing is complete.
  - The enhancements will be included in the new initial class scheduled in April 2003.
- Training for existing Billing Service Representatives will be developed and delivered to reinforce product understanding, highlight the importance of proper status with the customer and detailed claim responses, and review most common systems used for their segment. Development of the training is scheduled for completion on 3/31/03. Training sessions will be scheduled in April through July 2003.
  - This will be an interactive session that will allow students to take time for hands-on practice.

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<sup>8</sup> See Z-Tel November 5, 2002 Comments on Three Months of Ameritech Performance Results at pp.6-8. Similar comments are made in the Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters; see T5968-T5969.

## Bill Auditability and Dispute Resolution Plan

- At the conclusion of the training, the participants will be given a mastery test.
- A Claim/Dispute resolution checklist was developed and implemented with the claim/dispute service representatives on February 19, 2003. This checklist enables the service representative to perform the claim process steps in a methodical manner ensuring that every step is covered. The checklist will include direction for the service representative to include reference information, such as TN, repair ticket number, and/or interconnection agreement or tariff reference as appropriate.
- SBC Midwest developed and implemented an internal quality review process to perform a random sampling of processed claims to ensure accuracy and completeness; the sampling will be from actual claims made and products covered will be dependent upon claims submitted. The process was implemented on March 3, 2003.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
<b>Bill Auditability Support Actions</b>			
Clarify the Issue(s)			
• Schedule issue for future CLEC User Forum agenda schedule for high level discussion	2/20/03	2/21/03	Completed
• Conduct CLEC forum discussion	April 2003	April 2003	-----
• Identify External Bill Audit Training & Documentation			
• Identify external CABS BOS/BST training sources	1/27/03	3/31/03	In Progress
• Identify external industry documentation and publications	1/27/03	3/31/03	In Progress
• Update CLEC Online w/findings (if applicable)	3/3/03	3/31/03	In Progress
• Provide read-out on findings at CLEC user forum	April 2003	April 2003	-----
• CLEC Training's review/update of CLEC Billing Workshop	2/17/03	6/30/03	In Progress
• Explore alternate delivery of CLEC training	4/1/03	9/30/03	-----
• Evaluate need for CABS billing overview presentation	3/4/03	3/31/03	In Progress
• Develop a USOC reference guide			
• Develop a USOC reference guide	3/10/03	April 2003	In Progress
• Present USOC reference guide at CLEC User Forum	April 2003	April 2003	-----
<b>Dispute Resolution Process Improvements</b>			
• Claim Submission Process Overview Presentation at CUF	2/10/03	2/19/03	Closed
• Work with Billing Subcommittee formed during CUF and report progress to MPSC.	3/5/03	TBD	In Progress



## Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
• Provide immediate team coaching at core meeting, team meeting & January & February Segment meetings on importance of complete/accurate dispute disposition responses	12/19/02	2/28/03	Completed
• Identify additional process improvements via weekly LSC segment meetings	1/29/03	Ongoing	Ongoing
• Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives.	1/27/03	2/19/03	Completed
• Determine and assign resource to lead checklist development	1/27/03	1/27/03	Completed
• Develop checklist for SR to use when processing claims	1/27/03	2/14/03	Completed
• Conduct Training	2/17/03	2/18/03	Completed
• Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses	2/10/03	3/3/03	Completed
• Develop Service Rep validation scorecard	2/10/03	2/28/03	Completed
• Conduct validation sampling process	3/3/03	Ongoing	Ongoing
• Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives.	02/03/03	7/31/03	In Progress
• Determine and assign resource to lead development effort	02/03/03	7/31/03	In Progress
• Produce training package	02/03/03	03/31/03	In Progress
• Create training schedule	03/14/03	03/31/03	In Progress
• Conduct Training	April 2003	7/31/03	-----

## **4. Status Reporting**

Additionally, SBC will file a report regarding its progress on this plan to the Commission for its review and serve a copy of the report on the parties of record in MPSC Case No. U-12320 in April, July, and October 2003. These quarterly reports will address status of both bill auditability and billing dispute resolution. Specifically, with respect to bill auditability, SBC will provide a status of the SBC and externally available training options available for CABS, LSB and RBS that have been communicated to CLECs during the period under review. With respect to USOC support materials, SBC will report out on its analysis of the appropriate approach to providing such information, as well as its progress. With respect to billing dispute resolution, SBC will summarize the status of the CLEC User Forum sub-committee addressing this issue and the status of training provided to the LSC representatives responsible for resolution of billing disputes during the period under review. SBC will provide summarized results on the quarterly quality assurance review programs described above during the period under review. Where applicable, details on deviations and corresponding corrective actions will be provided.



**MPSC Case No. U-12320**

**Draft Improvement Plan**

**For**

**Bill Auditability**

**February 13, 2003**

**Bill Auditability and Dispute Resolution Plan**



**March 13, 2003**

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## Bill Auditability and Dispute Resolution Plan

### Purpose

## 1. Purpose

A number of CLECs raised issues relating to billing auditability and the billing dispute resolution process in their respective comments made or filed during November 2002. For the most part, the comments made were general in nature with few actionable specifics provided.<sup>1</sup> In its January 13, 2003 Order, the Michigan Public Service Commission ("MPSC") required Michigan Bell Telephone Company ("SBC") to "include in its February 13, 2003 filing an improvement or compliance plan to address these issues." Based on the CLEC comments and information gathered from its account managers and other staff involved in providing support to CLECs, SBC understands~~understood~~ the billing auditability issue to be difficulties in reconciling CABS billing statements and with utilizing SBC's billing dispute resolution process when issues arise.

arise. SBC filed its draft on February 13, 2003 to address these concerns. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003.

This ~~improvement~~ plan addresses the general bill auditability and dispute resolution process concerns that have been raised. Status on these improvements~~actions~~ will be monitored by SBC and ~~shared with the MPSC. This improvement~~filed with the MPSC, with service on the parties of record for MPSC Case No. U-12320. This plan does not address ~~any pending CLEC specific~~the CLEC-specific billing questions submitted. SBC ~~will address~~has addressed those issues on an individual basis with the questioning CLEC.<sup>2</sup> ~~SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4-5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003. CLEC and will continue to do so consistent with then existing processes and procedures.~~<sup>3</sup>

<sup>1</sup> ——— See Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters specifically comments of: TDS Metrocom (T5953) and ZTel (T5961, T5967). Also, see XO Michigan, Inc's November 5, 2002 Comments on Three Months of Ameritech Performance at p. 5.

<sup>2</sup> ——— On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC.

<sup>3</sup> On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC. On February 25, 2003, SBC's Account Team responded.

## 2. Issue Definition

### A. CABS Billing Auditability

The billing auditability concerns appear to be focused on the Carrier Access Billing System (“CABS”). SBC Midwest implemented CABS BOS BDT<sup>4</sup> format billing for all UNE products in October 2001, consistent with the FCC’s Uniform and Enhanced OSS Plan of Record (the “POR”). The CLECs in general, and WorldCom in particular, were strong proponents of the move to CABS billing. As WorldCom stated, CABS billing “results in a highly dependable and auditable bill.”<sup>5</sup>

CABS is an industry standard format for billing that has been in use for years in the interexchange access business as well as by CLECs. These industry standards are defined by the Ordering and Billing Forum (“OBF”) which includes CLEC representation. As an OBF member, SBC adheres to the CABS billing requirements set by the OBF. This adherence ensures that all SBC Midwest CLEC customers receive a standard, non-discriminatory bill format which is documented and subject to an externally controlled change process. Accessible letters are issued to notify the CLECs of software changes to CABS; these notices include illustrative exhibits when appropriate.

SBC understands that not all CLECs may be conversant in reviewing their billing statements for auditing purposes. SBC CLEC Billing Workshops are available in each of the SBC regions to help CLECs read and interpret the [CABS and RBS CABS, LEC Services Billing \(“LSB”\)](#), and [Resale Billing System \(“RBS”\)](#) bills received from SBC. This 1-1/2 day workshop includes information on identifying the components that make up the [CABS and Resale CABS, LSB and RBS](#) bills as well as using Daily Usage Files (“DUF”) and Ameritech Electronic Billing System (“AEBS”) files. The workshop is available on an ongoing basis for scheduling; additional sessions can be added as needed based upon CLEC demand. Requests for any “on demand” courses are typically added to the schedule within a few weeks. In 2002, this Billing workshop was conducted seven times with 20 CLECs participating in one or more sessions.<sup>6</sup> Three workshops were cancelled due to no enrollment.

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<sup>4</sup> ——— CABS BOS BDT stands for Carrier Access Billing System Billing Output Specifications Bill Data Tape, which is a guideline format overseen by the Ordering and Billing Forum, an industry organization that provides standard billing guidelines.

<sup>5</sup> ——— Direct Testimony of A. Earl Hurter on Behalf of MCI Metro Access Transmission Services, Inc. dated September 25, 2000, pg 5, line 12-13. Mr Hurter also indicates in his testimony that the CABS BOS format provides “efficient bill receipt, audit and payment is predicated on a predictable, well defined electronic bill format which allows for levels of summarization by end office, jurisdiction, LATA and state”. (pg 2, lines 17-19)

<sup>6</sup> ——— Of the CLECs commenting on this issue, none participated in the available training in 2002.



## Bill Auditability and Dispute Resolution Plan

BearingPoint conducted extensive testing of SBC Midwest's CABS billing, evaluating the billing of recurring, non-recurring, and fractional charges as well as sums and cross totals on CABS bills. BearingPoint found that SBC exceeded the 95% benchmark for each of these categories. The BearingPoint [Michigan OSS Evaluation Project](#) Report issued on October 30, 2002 specifically evaluated recurring charges on UNE-P bills and determined that 98.9% of these charges were consistent with applicable tariff and/or contracts. (See TVV9-6, at p. ~~1000~~-1000.) Non-recurring and fractional rates on UNE-P bills were evaluated under TVV9-9 testing and the results indicated 99.2 % of the rates [were](#) consistent with applicable tariff and/or contracts. (See p. 1002)

### **B. Billing Dispute Resolution**

SBC's billing claims and adjustments process begins with the [LSC Local Service Center \("LSC"\)](#) Claims/Dispute organization, which is responsible for processing CLEC billing claims and disputes. SBC's billing claim dispute resolution process is documented on CLEC Online and references the escalation procedures available to a CLEC dissatisfied with the disposition of its claim.<sup>7</sup> If the CLEC is still dissatisfied after the escalation process is complete, it can enter into the [Alternate Informal](#) Dispute Resolution ("[ADR](#)") ("[IDR](#)") process as outlined in the CLEC's interconnection [agreement](#). ~~The [ADR](#) agreement.~~<sup>8</sup> The [IDR](#) process generally begins with the Account Manager working with the CLEC to resolve the billing dispute, then notifying the LSC of the resolution. If the CLEC is still not satisfied with the resolution, escalation procedures are generally provided for in the [ADR/IDR](#) process to bring the issue to SBC [upper senior](#) management. A CLEC that does not have an interconnection agreement at the time of the billing dispute would also use its account manager to escalate and resolve billing disputes.

BearingPoint conducted comprehensive testing of SBC Midwest's support of CLEC billing related claims and inquiries. Testing included documentation reviews, interviews with SBC personnel and ~~on-site~~[on-site](#) observations of help desk operations. BearingPoint found that the billing support process clearly included procedures for accepting, acknowledging, investigating, tracking, and closing CLEC claims, issues, and inquiries. (See PPR10-3 through PPR10-5, pp. 668-671)

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<sup>7</sup> ———Go to <https://clec.sbc.com/clec>, click on CLEC Handbook, choose a state's handbook i.e. Michigan, and then select Billing from the menu provided on the left side of the screen.

<sup>8</sup> Go to <https://clec.sbc.com/clec>, click on Getting Started as a CLEC, choose Account Management Responsibilities, and then select Dispute Resolution under the General Responsibilities heading.

### 3. Actions

#### **A. CABS Billing Auditability**

SBC will take the following actions to address the CLEC and MPSC concerns regarding billing ~~auditability~~: auditability. When a CLEC raises a bill auditability issue, SBC will:

First, confirm that the CLEC is familiar with the support that is available -

- When contacted, SBC account managers will advise CLECs interested in modifications to the CABS BOS standards (e.g. call flows, interconnection agreement pricing schedules, tariff page references, additions) to submit their business need to the OBF.
- SBC Midwest Account Managers will remind their clients, as appropriate, of the ongoing availability and value in attending the SBC CLEC billing workshops. A general reminder also will be provided at the SBC CLEC User forum during or before April 2003.

Second, clarify with the CLEC the specifics of its concerns -

- Given the nonspecific nature of the Bill Auditability comments submitted by many of the CLECs, the issue will be added as an agenda item to the ~~SBC CLEC User Forum during or before April 2003~~. April 2003 SBC Midwest CLEC User Forum.
- At that forum, SBC will extend to the CLEC community, an invitation to schedule on an individual basis, a working session with SBC to discuss company specific billing auditability concerns.

Third, identify additional available support options -

- ~~SBC will investigate the availability of bill auditability training sessions offered by external vendors and provide results of that investigation to the account managers and for CLEC Online updates. Initial evaluation will be completed by March 15, 2003.~~
- 2003, however SBC will continue to research other avenues and provide status at the April 2003 Midwest CLEC User Forum
- SBC will evaluate the need to develop a CABS billing overview presentation to be delivered during a SBC Midwest CLEC User forum. ~~An evaluation timeframe will be provided at the March 4, 2003 CLEC Collaborative.~~ Initial evaluation will be completed by March 31, 2003.
- SBC will assess the viability of posting limited industry documentation on the CLEC Online website. Initial evaluation will be completed by March 15, ~~2003~~. 2003; SBC will provide status on findings at the April 2003 Midwest CLEC User Forum.
- SBC will develop a USOC reference guide which will map USOCs to the multi-state generic interconnection agreement and present this at the April 2003 SBC Midwest CLEC User Forum. On a going forward basis CLEC interconnection agreement USOC mapping requests should be provided to, and will be handled through, the specific CLEC's account manager.

## Bill Auditability and Dispute Resolution Plan

- The review of the existing complement of CLEC workshops and Operation Support System classes is an ongoing activity. Participant feedback from the 2002 Billing Workshop sessions are considered in identifying course ~~improvements; an evaluation timeframe for the review of the Billing Workshop will be provided at the improvements.~~ The review of the CLEC Billing Workshop, along with any related course material ~~collaborate session scheduled for March 4, 2003.~~updates, will be completed by June 30, 2003.
- SBC will evaluate the feasibility of other training delivery methods. ~~An evaluation timeframe will be provided at the March 4, 2003 CLEC Collaborate.~~Evaluation will be completed by September 30, 2003.

### B. Billing Dispute Resolution

SBC will take the following actions to address the Dispute Resolution Process concerns raised.

The following actions will be taken to improve the CLECs' understanding of the billing dispute resolution process.

- Managers from the LSC's Claims/Dispute Resolution organization ~~will be~~were scheduled to provide an overview of the claim submission process at ~~the February 2003 SBC Midwest CLEC User Forum meeting during or before April 2003.~~
- ~~meeting. During that forum, the CLECs indicated they understood the claim process and preferred to discuss more specific bill dispute issues. A subcommittee, with representation from the various impacted SBC organizations and the CLECs, was created to address claims/dispute related issues; the subcommittee's first call took place on March 5, 2003. The subcommittee is expected to continue to meet periodically into the second quarter, with evaluation of continuation made at that time.~~
- When contacted, the Account Management teams will work with the LSC to schedule CLEC specific meetings to address their billing claim issues.

The following SBC internal training and documentation improvements will be implemented to improve the quality of the billing dispute resolution process.<sup>9</sup>

- The LSC Billing representative initial training course will be updated to address the gaps identified by the CLEC comments (~~e.g., i.e.~~ stress process and communication with the CLEC, UNE-P product knowledge).
  - Classroom exercises will be incorporated to ensure sufficient practice occurs and mastery testing is complete.
  - The enhancements will be included in the new initial class scheduled ~~for in~~ April 2003.

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<sup>9</sup> ——— See Z-Tel November 5, 2002 Comments on Three Months of Ameritech Performance Results at pp.6-8. Similar comments are made in the Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters; see T5968-T5969.

## Bill Auditability and Dispute Resolution Plan

- Training for existing Billing Service Representatives will be developed and delivered to reinforce product understanding, highlight the importance of proper status with the customer and detailed claim responses, and review most common systems used for their segment. Development of the training is scheduled for completion on 3/31/03. Training sessions will be scheduled in April through ~~June~~July 2003.
  - This will be an interactive session that will allow students to take time for hands-on practice.
  - At the conclusion of the training, the participants will be given a mastery test.
- A Claim/Dispute resolution checklist ~~will be~~was developed and ~~shared~~implemented with the claim/dispute service ~~representatives~~. ~~The checklist will enable~~representatives on February 19, 2003. This checklist enables the service representative to perform the claim process steps in a methodical manner ensuring that every step is covered. ~~This checklist is under development and will be implemented on~~The checklist will include direction for ~~or before 2/20/03~~the service representative to include reference information, such as TN, repair ticket number, and/or interconnection agreement or tariff reference as appropriate.
- SBC ~~will design and implement~~Midwest developed and implemented an internal quality review process ~~that will~~to perform a random sampling of processed claims to ensure accuracy and ~~completeness~~. ~~The process is currently under development and will be~~completeness; the sampling will be from actual claims made and products covered ~~will be dependent upon claims submitted~~. The process was implemented on March 3, 2003.
- 2003.

The following table provides the schedule for the actions discussed in this section:

## Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
<b>Bill Auditability Support Actions</b>			
Clarify the Issue(s)			
<del>• Schedule issue for future CLEC User Forum agenda schedule for high level discussion</del>	<del>2/20/03</del>	<del>2/21/03</del>	
• <u>Schedule issue for future CLEC User Forum agenda schedule for high level discussion</u>	<u>2/20/03</u>	<u>2/21/03</u>	<u>Completed</u>
<del>• Conduct CLEC forum discussion</del>	<del>TBD</del>	<del>April 2003</del>	
• <u>Conduct CLEC forum discussion</u>	<u>April 2003</u>	<u>April 2003</u>	<u>-----</u>
• Identify External Bill Audit Training & Documentation			
<del>• Identify external CABS BOS/BST training sources</del>	<del>1/27/03</del>	<del>3/15/03</del>	<del>In Progress</del>
• <u>Identify external CABS BOS/BST training sources</u>	<u>1/27/03</u>	<u>3/31/03</u>	<u>In Progress</u>
<del>• Identify external industry documentation and publications</del>	<del>1/27/03</del>	<del>3/15/03</del>	<del>In Progress</del>
• <u>Identify external industry documentation and publications</u>	<u>1/27/03</u>	<u>3/31/03</u>	<u>In Progress</u>
<del>• Update CLEC Online w/findings (if applicable)</del>	<del>3/3/03</del>	<del>3/20/03</del>	
• <u>Update CLEC Online w/findings (if applicable)</u>	<u>3/3/03</u>	<u>3/31/03</u>	<u>In Progress</u>
• <u>Provide read-out on findings at CLEC user forum</u>	<u>April 2003</u>	<u>April 2003</u>	<u>-----</u>
<del>• CLEC Training's review/update of CLEC Billing Workshop</del>	<del>TBD</del>	<del>TBD</del>	
• <u>CLEC Training's review/update of CLEC Billing Workshop</u>	<u>2/17/03</u>	<u>6/30/03</u>	<u>In Progress</u>
<del>• Explore alternate delivery of CLEC training</del>	<del>TBD</del>	<del>TBD</del>	
• <u>Explore alternate delivery of CLEC training</u>	<u>4/1/03</u>	<u>9/30/03</u>	<u>-----</u>
• <u>Evaluate need for CABS billing overview presentation</u>	<u>3/4/03</u>	<u>3/31/03</u>	<u>In Progress</u>
• <u>Develop a USOC reference guide</u>			
• <u>Develop a USOC reference guide</u>	<u>3/10/03</u>	<u>April 2003</u>	<u>In Progress</u>
• <u>Present USOC reference guide at CLEC User Forum</u>	<u>April 2003</u>	<u>April 2003</u>	<u>-----</u>
<b>Dispute Resolution Process Improvements</b>			
<del>• Claim Submission Process Overview Presentation</del>	<del>2/10/03</del>	<del>April 2003</del>	<del>In Progress</del>
<del>• Determine presentation material(s)</del>	<del>2/10/03</del>	<del>3/14/03</del>	<del>In Progress</del>
<del>• Present Claims Process Overview @ CLEC forum</del>	<del>TBD</del>	<del>April 2003</del>	
<del>• Provide immediate team coaching at core meeting, team meeting &amp; January &amp; February Segment meetings on</del>	<del>12/19/02</del>	<del>2/28/03</del>	<del>In Progress</del>

## Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
<del>importance of complete/accurate dispute disposition responses</del>			
• <a href="#">Claim Submission Process Overview Presentation at CUF</a>	<a href="#">2/10/03</a>	<a href="#">2/19/03</a>	<a href="#">Closed</a>
• <a href="#">Work with Billing Subcommittee formed during CUF and report progress to MPSC.</a>	<a href="#">3/5/03</a>	<a href="#">TBD</a>	<a href="#">In Progress</a>
<del>• Identify additional process improvements via weekly LSC segment meetings</del>	<del><a href="#">1/29/03</a></del>	<del><a href="#">Ongoing</a></del>	<del><a href="#">Ongoing</a></del>
• <a href="#">Provide immediate team coaching at core meeting, team meeting &amp; January &amp; February Segment meetings on importance of complete/accurate dispute disposition responses</a>	<a href="#">12/19/02</a>	<a href="#">2/28/03</a>	<a href="#">Completed</a>
• <a href="#">Identify additional process improvements via weekly LSC segment meetings</a>	<a href="#">1/29/03</a>	<a href="#">Ongoing</a>	<a href="#">Ongoing</a>
<del>• Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives.</del>	<del><a href="#">1/27/03</a></del>	<del><a href="#">2/19/03</a></del>	<del><a href="#">In Progress</a></del>
<del>• Determine and assign resource to lead checklist development</del>	<del><a href="#">1/27/03</a></del>	<del><a href="#">1/27/03</a></del>	<del><a href="#">Completed</a></del>
• <a href="#">Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives.</a>	<a href="#">1/27/03</a>	<a href="#">2/19/03</a>	<a href="#">Completed</a>
• <a href="#">Determine and assign resource to lead checklist development</a>	<a href="#">1/27/03</a>	<a href="#">1/27/03</a>	<a href="#">Completed</a>
<del>• Develop checklist for SR to use when processing claims</del>	<del><a href="#">1/27/03</a></del>	<del><a href="#">2/14/03</a></del>	<del><a href="#">In Progress</a></del>
<del>• Conduct Training</del>	<del><a href="#">2/18/03</a></del>	<del><a href="#">2/19/03</a></del>	
• <a href="#">Develop checklist for SR to use when processing claims</a>	<a href="#">1/27/03</a>	<a href="#">2/14/03</a>	<a href="#">Completed</a>
• <a href="#">Conduct Training</a>	<a href="#">2/17/03</a>	<a href="#">2/18/03</a>	<a href="#">Completed</a>
<del>• Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses</del>	<del><a href="#">2/10/03</a></del>	<del><a href="#">3/3/03</a></del>	<del><a href="#">In Progress</a></del>
• <a href="#">Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses</a>	<a href="#">2/10/03</a>	<a href="#">3/3/03</a>	<a href="#">Completed</a>
<del>• Develop Service Rep validation scorecard</del>	<del><a href="#">2/10/03</a></del>	<del><a href="#">2/28/03</a></del>	<del><a href="#">In Progress</a></del>
• <a href="#">Develop Service Rep validation scorecard</a>	<a href="#">2/10/03</a>	<a href="#">2/28/03</a>	<a href="#">Completed</a>
<del>• Conduct validation sampling process</del>	<del><a href="#">3/3/03</a></del>	<del><a href="#">Ongoing</a></del>	
• <a href="#">Conduct validation sampling process</a>	<a href="#">3/3/03</a>	<a href="#">Ongoing</a>	<a href="#">Ongoing</a>
<del>• Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives.</del>	<del><a href="#">02/03/03</a></del>	<del><a href="#">6/30/03</a></del>	<del><a href="#">In Progress</a></del>
• <a href="#">Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives.</a>	<a href="#">02/03/03</a>	<a href="#">7/31/03</a>	<a href="#">In Progress</a>
<del>• Determine and assign resource to lead development effort</del>	<del><a href="#">02/03/03</a></del>	<del><a href="#">6/30/03</a></del>	<del><a href="#">In Progress</a></del>
• <a href="#">Determine and assign resource to lead development effort</a>	<a href="#">02/03/03</a>	<a href="#">7/31/03</a>	<a href="#">In Progress</a>
• <a href="#">Produce training package</a>	<a href="#">02/03/03</a>	<a href="#">03/31/03</a>	<a href="#">In Progress</a>

## Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
<del>• Create training schedule</del>	<del>03/14/03</del>	<del>03/31/03</del>	
• <u>Create training schedule</u>	<u>03/14/03</u>	<u>03/31/03</u>	<u>In Progress</u>
<del>• Conduct Training</del>	<del>April</del>	<del>06/30/03</del>	
	<del>2003</del>		
• <u>Conduct Training</u>	<u>April</u>	<u>7/31/03</u>	<u>-----</u>
	<u>2003</u>		

## 4. Status Reporting

Additionally, SBC will ~~provide file~~ a report regarding its progress on this ~~improvement~~ plan to the Commission for its review ~~in April 2003 and in July 2003 and quarterly thereafter if needed.~~ and serve a copy of the report on the parties of record in MPSC Case No. U-12320 in April, July, and October 2003. These quarterly reports will address status of both bill auditability and billing dispute resolution. Specifically, with respect to bill auditability, SBC will provide a status of the SBC and externally available training options available for CABS, LSB and RBS that have been communicated to CLECs during the period under review. With respect to USOC support materials, SBC will report out on its analysis of the appropriate approach to providing such information, as well as its progress. With respect to billing dispute resolution, SBC will summarize the status of the CLEC User Forum sub-committee addressing this issue and the status of training provided to the LSC representatives responsible for resolution of billing disputes during the period under review. SBC will provide summarized results on the quarterly quality assurance review programs described above during the period under review. Where applicable, details on deviations and corresponding corrective actions will be provided.